IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE 2014 JUN 17 PM 4: 58

Chris Sevier Plaintiff U.S. DISTRICE COURT MIDDLE DISTRICT OF TN

V.

3:14-1313

Google, Verizon, Samsung,
Android, LG, Motarola, xBox,
Microsoft, Governor Bill
Haslam, in his official capacity,
and Attorney General Bob
Cooper, in his official
Capacity, Planned Parenthood
Defendants

CASE NO: Honorable

ORIGINAL COMPLAINT PORN WARS

DECLARATION OF PORN WARS

"Out of the mountain of despair, a stone of hope." Dr. King

For the love of money is a root of all kinds of evil. 1 Timothy 6:10

We are not merely a bundle of chemicals or animated pieces of meat. We are imaginative beings crafted by the hands of a Supreme Artist.

The music video for this lawsuit:

For those on the side of the truth: https://www.youtube.com/watch?v=K65I_UrPFPQ;

https://www.youtube.com/watch?v=xFLi8OjvHFQ

For those on side of sex trafficking https://www.youtube.com/watch?v=mxJK9F0SHuQ

This matter is of interest to the public. The complaint is divided into five sections. The first four are crafted to enable the public to follow the issues as well as the Defendants. The Defendants and Court should remember that "Pro se complaints are to be held "to less stringent standards than formal pleadings drafted by lawyers," and should therefore be liberally construed. See Martin v. Overton, 391 F.3d 710, 712 (6th Cir.2004).

TABLE OF AUTHORITIES

SECTION I: FRAMING THE ISSUE

IMPLIED PARTNERSHIP7
SEX TRAFFICKING IS MODERN DAY SLAVERY AND THIS CASE CAN INFLICT A BLOW TO THE DEMAND SIDE
SEX TRAFFICKING IS MODERN DAY SLAVERY, NOT HOMOSEXUAL RIGHTS - PROPONENTS OF SAME SEX MARRIAGE ARE PART OF THE PROBLEM SPREADING THE WRONG PERMISSION GIVING BELIEFS OUT SEXUALITY
THE STONE THAT WILL KILL GOLIATH20
THE OLDEST TRICK IN THE BOOK "THOU LOOKEST OVER THERE"- ITS THE INTERNET
CUTTING THROUGH LIES TO LEAD US TO A RICHER FREEDOM: UNITING US AS "WE THE PEOPLE"
IT IS THE DUTY OF THE MANUFACTURE TO MAKE THEIR PRODUCTS SAFE, NOT THE JOB OF A THIRD PARTY
ANTICIPATION OF THE FLAWED CENSORSHIP ARGUMENT WHICH IS BASED ON A SET OF EXCLUSIVE RELIGIOUS FALSE TRUTH CLAIMS
THE DEFENDANTS' TOTAL FREEDOM ARGUMENT INVITE CUSTOMERS TO BECOME A FISH ON THE GRASS
TROLLING37
PORN IS LOOKING FOR US
DOMESTIC CASE: THE BEST INTEREST OF THE CHILDREN IS PARAMOUNT T.C.A §§ 36-6-101 et seq
IF YOU WANT TO KILL A SNAKE, CUT ITS HEAD OFF
THE DEVICE MAKERS' PRODUCT IS LIKE A PLAYBOY MAGAZINE: THE DEVICE IS LIKE BOOKENDS WITH SMUT INSIDE
PORN AND HOMOSEXUAL SUBJECT MATTER ARE ON PAR WITH TALKS OF BATHROOM BUSINESS
THE UNITES STATES SUPREME COURT HAS RECOGNIZED THE SECONDARY EFFECTS OF PORNOGRAPHY ON SOCIETY
STRENGTHENING SYSTEMS OF NATURAL ACCOUNTABILITY: A WAKE CALL TO RETURN TO CHRIST CENTRIC REALITY

THE DEFENDANTS ARE DISTRIBUTING ADDICTION AND PROLIFERATING LIES THAT ERODE PERSONAL AND COLLECTIVE FREEDOM		
THE GOSPEL OF LIES DOES NOT STOP THERE		
THE DEFENDANTS ARE LIKE INSIDERS ON A BANK HIEST		
SECTION II: THE SOLUTION		
PROPOSED SOLUTION		
JOINT TASK FORCE WITH ALLIES IN THE UNITED KINGDOM, FRANCE, AUSTRALIA, GERMANY, ECT		
FACE TO FACE ENCOUNTER & THE LIST67		
THE LIST68		
HOW ME THE MONEY: I AM GOING TO MAKE THE DEFENDANTS MONEY THOUGH THE IMPLEMENTATION OF A SIX TAX		
SECTION III: THE ELEMENTS		
FIDUCIARY RELATIONSHIP AND VIOLATION OF PERFECT GOOD FAITH ELEMENTS		
FAILED TO OPERATE AS EXPECTED ELEMENT74		
THE ELEMENT OF CIVIL CONSPIRACY: MANUFACTURERS ARE IN BED WITH PREDATORY PORNOGRAPHERS		
ESTABLISHING THAT THE DEFENDANTS' PRODUCTS WERE DEFECTIVE UNDER TENN. CODE ANN. § 29-28-102(2)		
BREACH OF DUTY ELEMENT79		
INSTRUMENTALITY WITH THE DEFENDANTS CONTROL ELEMENT80		
OUTRAGEOUSNESS ELEMENT OF PRODUCTS LIABILITY TORT IS PRESENT HERE		
ELEMENT OF VICARIOUS LIABILITY: ALL DEVICE MAKERS, LIKE ALL BRANDS OF TOBACCO, ARE EQUALLY LIABLE UNDER AGENCY LAW85		
SECTION IV: PUBLIC POLICY CONSIDERATIONS		
COVENANTAL MARRIAGE ACT88		
PLANNED PARENTHOOD MUST BE SHUT DOWN IMMEDIATELY FOR OFFENDING THE SCIENCE OF DOPAMINE		
ADDRESSING A HOUSE KEEPING MATTER: TO MITIGATE THE BANDWAGON CHARACTER ATTACKS IN THE PRESS		

please9		
SECTION FIVE: THE COMPLAINT		
PARTIES98		
JURISDICTION AND VENUE99		
FACTS		
CAUSES OF ACTION		
COUNT 1: FRAUD, including FRAUDULENT MISREPRESENTATION, FRAUDULENT CONCEALMENT, FRAUD AND DECEIT, MISREPRESENTATION BY OMISSION; CONSTRUCTIVE FRAUD		
COUNT 2: PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN11		
COUNT 3 (STRICT LIABILITY) PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN) T.C.A. § 29-28-101 et seq		
COUNT 4: NEGLIGENCE PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN		
COUNT 5: COUNT BREACH OF IMPLIED WARRANTIES: 47-2-314		
COUNT 6: UNFAIR AND DECEPTIVE TRADE PRACTICES PURSUIT TO TCA § \$ 47-18-101 et. seq. CONSUMER PROTECTION ACT		
COUNT 7: RES IPSA LOQUITUR RELATING TO PERSONAL INJURY124		
COUNT 8: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS12:		
COUNT 9: TORTIOUS INTERFERENCE		
COUNT 10: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS		
COUNT 11: OUTRAGEOUS CONDUCT		
COUNT 12: CIVIL CONSPIRACY		
COUNT 13: BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING13		
COUNT 14: FEDERAL VIOLATION OF SECTION 15 U.S.C. §§ 1051 ET SEQ: LANHAM ACTFOR FALSE ADVERTISING		
COUNT 15: FALSE ADVERTISING (Tennessee Common Law)		
COUNT 16: JOINT AND SEVERALLY LIABLE:		
COUNT 17: NEGLIGENT MISREPRESENTATION		
COUNT 18: DUE PROCESS		

COUNT 19: First Amendment — Free Exercise - Violation in Kind
TABLE OF AUTHORITIES
American Booksellers Ass'n v. Commonwealth of Va., 882 F2d 125 (4th Cir. 1989)110
Ashcroftv. Free Speech Coalition, 535 US. 234 (2002)
Commonwealth v. American Book sellers Ass'n,372S.E.2d 6180 (1988)
Crawfordv. Lungren, 96 F3d 380 (9th Cir. 1996)
Church of the Holy Trinity v. United States, 143 U.S. 457 (1892)9
Doe 1 ex rel. Doe v. Roman Catholic Diocese, 154 S.W.3d 22, 39 (Tenn. 2005)
Evans v. Pearson Enters., Inc., 434 F.3d 839, 852-53 (6th Cir. 2006)
Ginsberg v. New York, 390 US. 629 (1968)
Hagen v. U-Haul Co. of Tenn., 613 F. Supp. 2d 986, 996 (W.D. Tenn. 2009)
Lane v. Becker, 334 S.W.3d 756, 763 (Tenn. Ct. App. 2010)
Lemon v. Kurtzman, 403 U.S. 602 (1971)
Loving v. Virginia, 388 U.S. 1 (1967)
Miller v. California, 413 U.S. 15, at 23 (1973)
Miller v. Wilbanks, 8 S.W.3d 607, 612 (Tenn. 1999)82
New Yorkv. Ferber, 458 U.S. 747, at 754 (1982)
Paris Adult Theatre Iv. Slaton, 413 US 49, at 63,69 (1973)
Pope v. Illinois, 481 U.S. 497, at 500-01 (1987)
Osborne v. Ohio, 495 US 103 (1990)
Reynolds v. United States, 98 U.S. 145, 164 (1879)
Riley v. Whybrew, 185 S.W.3d 393, 399 (Tenn. Ct. App. 2005)82
Reno v. ACLU, 521 U.S. 844, 117 S.Ct. 2329, at 2347, n 4 4 (1997)
Roth v. United States, 354 U.S. 476, at 485 n. 15 (1957)
Smith v. United States, 431 U.S. 291, at 300-02, 309 (1977)
Towle v. Phillips, 172 S.W.2d 806, 808 (Tenn. 1943)79
United States v Acheson, 195 F3 at 645 (11th Cir 1999)
United States v. American Library Ass 'n 529U.S. 123 S.Ct. 2297 (2003) 111

UnitedStates v. Knox, 32 F3d 733 (3rd Cir. 1994), cert. denied, 11 5 S. C (1995)	
United States v. Hilton, 167 F3d 61(1st Cir.1999)	109
United States v. Wiegand, 812F2d 1239 (9th Cir. 1987)	109
United States v. X-Citement Video, Inc., 115 S.Ct. 464 (1994)	109
<u>STATUTES</u>	
T.C.A. § 29-28-101, et seq	1, 76, 77, 115, 116
15 U.S.C.§ 1051	1, 99, 131
T.C.A. § 47-2-316	1, 119
T.C.A. § § 47-18-101 et. seq	1, 120
T.C.A. § 29-39-104	118
T.C.A. § 47-2-314	119
42 U.S.C. §1983	1, 16, 99
T.C.A. §§ 36-6-101 et seq	38
28 U.S.C. §§ 2201	99
28 U.S.C. §§ 2201	99
28 U.S.C. § 1391	99
28 U.S.C. §§ 1331	99
28 U.S.C. 1332	99
COPA, 47 US.C § 230	110
18 U.S.C. Chapter 110	22, 106, 109, 135
T.C.A. §§ 39-17-901-927	135, 22
47 U. S. C. §231	22, 136
Article 134 of the UCMJ	153, 125
U.S. Const. amend. I, § 1	1, 135
U.S. Const. amend. XIV, § 1.	1, 135

SECTION I: FRAMING THE ISSUE

NOW COMES I, Chris Sevier, former Judge Advocate and Eagle Scout, in a complaint for damages and injunctive relief, standing in the shoes of an executive with leadership qualities, against the sex trafficking Defendants under the (1) Tennessee Products Liability Act of 1978, T.C.A. § 29-28-101, et seq. T.C.A. § 29-28-105, under (2) the Lanham Act15 U.S.C. § 1051 for false advertising, under (3) breach of implied warranties (T.C.A. § 47-2-316), under (4) deceptive trade practices, TCA § § 47-18-101 et. seq, under (5) 42 U.S.C. §1983 for violations under the 1st and 14th Amendments - due the executive branches refusal to impose obscenity laws on device makers, yielding interference of the freedom of worship. In one sentence: I seek to make pornography that is otherwise being pumped into our homes and on to our persons 24/7 in violation of state and Federal obscenity law through intentional design flaws in laptops and cell phones, harder to access in light of (1) the realities of our human design, (2) the brain science of dopamine, and (3) the evidence that pornography is part of a seamless interconnected continuum with sex trafficking, child exploitation, sexual orientation modification, and sexual compulsive promiscuity, which has created a public health crisis and silent epidemic in America and across the globe. The Defendants should be advised that if they attempt to by me off as Apple has they will be met the same results, and I will flaunt the offer to the press. We are in the midst of a sexual holocaust because our Nation has backed the wrong set of truth claims at our collective expense. The only way for the United States to survive is if it is reverts to a character based capitalistic society. If anyone scoffs at my demand, they need to know that they are acting as a proponents of child molestation and sex trafficking in the perpetuation of acts of self-hate. This is not primarily a faith-based lawsuit but a one based on the science of dopamine, oxytocin, 1. Before conditioning 2 defers conditioning Tuning tod Unconditioned No conditioned Unconditioned Scutrel stimulus stimulus 1. During conditioning ic. After conditioning Turang feet Conditioned

Conditioned

Unconditioned

and serotonin, put forth in Pavlov dog's experiment, regarding classical conditioning.

- 1. Yet despite science, the policies of the United States must return to cultivating a Christ/childcentric reality, not a self/adult centric one. From our inception we have been marked as a people who have acknowledged our need for mercy; we have never supported leaders who elevate themselves above God. Humans are spiritual beings, not just animalistic entities. We must abandon the inferior secular humanistic doctrine as a basis to shape policy, which is nose diving the United States into the ground. The Nation should immediate return to shaping our laws and policies to align with the the master narrative of the Founding Father's, who unquestionably shaped our Constitution to guarantee that our policies would mirror the New Testament. Although that seems narrow, it has proven time and time again to yield incredible spaciousness results and a richer freedom. It is paradoxical but true.
- 2. Even the Pentagon itself, asked me to win this case so that the Military can have the means to better combat instances of sexual assault that Defendants have encouraged by distributing pornography onto Soldier's persons through filterless mobile devices and laptops, which are present on our installations. The bottom-line is that the manner in which the manufacturers sell their products violations state and Federal obscenity laws, creating a

landscape of overwhelming temptation where it is virtually impossible for testosterone saturated males, like myself, to avoid being subjected to porn's influence. Just one exposure to porn can set a male or female on a collision course in a cycle that highjacks their capacity for intimacy at the expense of real relationships. These design flaw threaten family relationships, infringe upon religious freedoms, and warp our collective societal consciousness by fostering within us adverse permission giving beliefs that erode personal freedom and hurt the people within the zone of porn addicts influence. With every word I write, I sincerely believe that I am fighting sex trafficking. With ever word of opposition that is written, my opponents must know that they are perpetuating a sexual holocaust involving sex trafficking, child exploitation, nefarious greed, and the same homosexual dishonesty that poses a massive threat to the stability of 14th Amendment to the United States Constitution and our National identity. The Defendants and I should not be on the opposite sides of table in this matter. I should not have to use the Courts to take my Country back. The Defendants need to terminate the porn compact and return to the side of truth, justice, innocence, purity, and decency. Because of pride and greed, our society has placed itself in a persistent state of overwhelming temptation that must be rolled back to protect families, children, and to prevent sex crimes. There is no freedom in total freedom and debauchery. Seriously, were do we go from here: http://sobadsogood.com/2014/06/09/mileycyruss-artistic-porno-actually-awesome-by-Quentin-Jones-tongue-tied/. (Warning its a worse version of Grimes). The idea of self-accountability is arrogant, unrealistic, and ridiculous in light of the aggressive tactics of unscrupulous predatory pornographers. No man is an island, and we need one another in community to help hold each other in loving accountability. We all want community, Facebook, twitter, ect prove that. The human heart is capable of great acts of good or

great acts of evil, contingent upon what it is fed. With endless amounts of pornography just one click away, this picture symbolizes the environment that we are operating in when we purchase a filterless device:



IMPLIED PARTNERSHIP

3. Well, at least Apple and HP will not feel so singled out any more, since I have been pounding them at every turn in 3:13-cv-0607, painting them as the worst sex traffickers in human history, simply because that is what the evidence demonstrates for all manufacturers who are part of the porn compact. The media wrote that complaint off as a joke because the ways of God are foolishness to the ways of the secular world. But I can attest that Apple and HP are not laughing for good cause. (Post Kinsey, our societies has been sliding out of touch with the right reality). The evidence shows that Apple, HP, Dell, Verizon, LG, Samsung, xBox, Android, Motarola, Google, Microsoft, Blackberry, and other device makers came together and formed a "porn compact," agreeing collectively and individually not to comply with state and federal obscenity laws. The basis behind the partnership was an agreement that "if none of them honored obscenity

laws, none of them could be held accountable." (It is like the scenario when huge group of fans climb the fence at Coachella Music Festival at one time to overwhelm security to the point where they do not know who to arrest; so no one is). To ensure the success of this unlawful scheme, the manufacturers have each made major political contributions so that the executive and the legislature would look the other way. Therefore, the moment that one of members of the porn compact exposed me to obscene content through their product, which lead to my injury, all device makers, including the ones name here became personally liable to me under vicarious liability and agency law.

- 4. Unfortunately for those in the media who not so much on my side, I do not care what people think because I am living in a Christ/child centric reality, not a gland driven/adult centric one, where the purpose in life is to win some kind of frivolous celestial popularity contest (collecting twitter followers, Facebook likes, and instagram followers although I do like soundcloud.com/ghostwars but not for the reasons one my assume). I am a proponent of Jesus Christ, not Mr. Rogers; and Jesus Christ is the absolute truth embodied in a person, who was never afraid of standing against the opponents of truth and justice for the betterment of mankind. (President Obama thinks that he is the truth embodied in a person as well; I'd prefer to follow Christ's version, who was actually God).
- 5. I appreciate that my lawsuits may stir things up, but as Dr. King stated, "True peace is not merely the absence of tension; it is the presence of justice." I love people (especially my enemies), but I hate the ideas that lead humanity into darkness, destructive, despair, and disintegration. The Planned Parenthood, ACLU, pornography, Gay agenda has warped reality in the United State so greatly that there is a ton of anger in America by those who are living in the

Christ/child-centric reality, which should not be misconstrued as "hate." "Anger," you see, is not the opposite of love, as the gays have declared. Indifference is hate. And none of us should be indifferent to the impact of the fraud scheme to distribute pornography into our homes and persons for the benefit of capitalistic conglomerates, who are breaking the law, breeding immorality, and threatening our world through the escalation of a sex trafficking enterprise. I agree with Dr. King that "Injustice anywhere is a threat to justice everywhere. We are caught in an inescapable network of mutuality, tied in a single garment of destiny. Whatever affects one directly, affects all indirectly." So, I came to fight like hell, while inviting America to return to recognize that our identity should be our need for mercy - which will enable us to agree to shift back to a Christ/Child-centric reality.

6. America society needs to understand that pornography is driving technology and interfacing with superficial family friendly corporations. Live Chat, Streaming video, pop ups, online system payment, and anti-fraud security were all developed by the pornographers and capitalized on by the Defendants. Pornographers are the sex educators of our children. As a result of the Defendants porn compact, children have gone from Dr. Seuss to porn. The idol of greed must bow to the will of the God in the New Testament and the firmly established laws of the United States so that we can remain an example for other Nations and a light in this world. As we learned in the abolition of slavery, the will of God must triumph over greed, pride, and oppression. We are all religious. We do not all subscribe to the right religion when it comes to policy making. It takes a tremendous amount of faith to not believe in God. So, a return to laws and policies that parallel the new testament should not be balked at because the evidence shows time and time again that it is the best set of truth claims to base our laws and policies on.



SEX TRAFFICKING IS MODERN DAY SLAVERY AND THIS CASE CAN INFLICT A

BLOW TO THE DEMAND SIDE



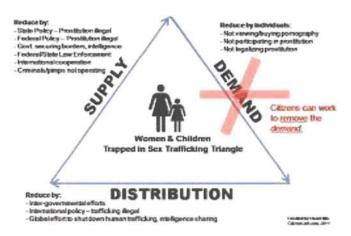
- 7. Make no mistake, we have a public health crisis on our hands and a silent epidemic, as a result of the distribution of hardcore pornography through the products sold by the Defendants.

 "The Defendants provide the crack pipe and the cocaine." Even Eric Holder, despite all of his best efforts to sabotage the United States, acknowledged that pornography is fueling sex trafficking (https://www.youtube.com/watch?v=8E5ITLCGaqY). Of course, Mr. Holder has not done anything about it. So, like it or not, I am here to be your modern day William Wilburforce, and this Court and the Court of public opinion are the parliament of change in the abolition of sex slavery, since the executive branch is completely worthless. The beauty of Courts is that they fix the break down in our system of Government, and I agree with Justice Thomas that America can "get it right."
- 8. As a former prosecutor, I am not interest in treating the symptoms of this problem, by ramping up prosecutions and putting people in prison. I am aimed at attacking the heart of the matter by inflicting a blow to the demand side sex trafficking, minimizing a source that feeds the poisonous seeds embedded in the hearts of all men. It is important for the United States to come to terms with the fact that without <u>faith</u>, there is no basis for <u>morality</u>. And without <u>morality</u>, there is no basis for <u>law</u>. And the <u>laws</u> of the United States were predicated on the <u>faith</u> and

morality of Christianity, and all other faiths and doctrines are counterfeit derivatives that have far more problems and simply do not work. The gospel of Barack Obama is idiotic for example. Overly moralistic societies are just as bad, accomplishing suffering and chaos (See the Middle East). Christianity is the reality that the policies and laws of the United States should parallel, regardless of a person's religion. The Supreme Court stated plainly that "America is a Christian Nation." Church of the Holy Trinity v. United States, 143 U.S. 457 (1892); so that should be the end of it. On the surface that position seems narrow, but the policy turns out to be extremely broad and enables us to enter into a richer freedom. Huckabee would have made a great President, merely because he is guided by the narrative of Christ, regardless of whether I personally like him or think he is a solid bass player. The laws and policies of the United States merely need to parallel Christianity, and we will all thrive. This is true no matter how much of an emotional problem folks at the ACLU have with God. Whether a person is a Christian or a non-Christian living in America is completely irrelevant. What is only at issue is that the laws and the policies of the United States should mirror the spirit of the New Testament principles, and we as a Nation can achieve heightened prosperity, once again.

9. The United States Constitution and the majority of our state and Federal laws were derived from the Bible because it is the yard stick for sanity and reason. To suggest otherwise is to rewrite history, which is what the Nazi's tried to do, which lead to their total disintegration. This lawsuit before this Court of Honor is my version of a come to Jesus meeting with the device makers. We have to stop suppressing the truth about things and drag these matters relating to sexuality out into the open. "For there is nothing hidden that will not be disclosed, and nothing concealed that will not be known or brought out into the open." Luke 8:17.

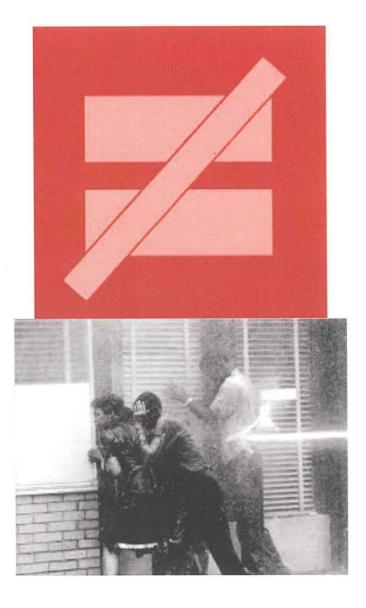
HUMAN SEX TRAFFICKING



SEX TRAFFICKING IS MODERN DAY SLAVERY, NOT HOMOSEXUAL RIGHTS PROPONENTS OF SAME SEX MARRIAGE ARE PART OF THE PROBLEM SPREADING THE WRONG PERMISSION GIVING BELIEFS OUT SEXUALITY

They traded God's truth for a lie, and they worshipped and served the creation instead of the creator, who is blessed forever. That's why God abandoned them to degrading lust. Their females traded natural sexual relations for unnatural sexual relations. Also, in the same way, the males traded natural sexual relations with females, and burned with lust for each other. Males performed shameful actions with males, and they were paid back with the penalty they deserved for their mistake in their own bodies. Romans 1:25-27





10. The gospel of pornography and homosexuality are interconnected and have collectively misguided the American public so extensively that I feel compelled to address them both to untwist the lies in the area of sexuality. One thing that is an amazing quality that humans have is the ability to live in a persistent state of self-deception. While we have heard it said that those who oppose same-sex marriage are living on the wrong side of history, I submit that those who support same-sex marriage are living on the wrong side of reality. A Federal Judge in Florida said as much, when I attempted to intervene in one of the same sex marriage cases in

defense of the integrity of the equal protection and due process clauses of the United State's

Constitution. The bottom-line is that there are those in the United States who are living in self/
adult-centric really and those living in Christ/child-centric reality. (Being overly moralistic is not
part of the Christ/Centric-mercy based reality by the way). Those realities will always will mesh,
but one is superior to the other regardless of religious beliefs. Conservatives say that liberals are
the problem with the world; liberals say that conservatives are the problem with the world.

Christians say that the human heart in each of us is the problem with the world (conservative and
liberal are equally included in that categorization). As an recording artist, I can assure you that I
am not a proponent of moralist command and control environments. I am not here to legislate
morality like Iran does.

11. Sex trafficking is our modern day slavery - not homosexual rights (which is predicated on fraud and self-deception). Having personally engaged in the same-sex marriage litigation in the 10th Circuit, 4th Circuit, 5th Circuit, 6th Circuit, and elsewhere regarding the homosexuals coordinated attack on DOMA, I can attest first hand that the homosexuals have equated their plight to race in monstrously fraudulent and bigoted ways, relying on cases like Loving v. Virginia, 388 U.S. 1 (1967). When I confronted the homosexual plaintiffs in those cases about expanding suspect class protection under the equal protection clause to the true minority classes of sexual orientation, the homosexuals had a nuclear melt, making an about face on their own arguments, demonstrating on the record the lack of morality and per se bigotry. The homosexuals manage to explain away their explanation, demonstrating that their entire plight is predicated exclusively on a set of adults, who made bad life style choices, who now want the the rest of society to make them feel normal about molesting members of the same sex (which will never

happen no matter what the law says); however, what will happen is more egregious if the homosexual's quest is successful: the homosexuals will recruit the children of traditional marriages to engage in gay conduct and become classically conditioned as they have to adopt a homosexual lifestyle, which disrupts natural systems of accountability; trades truth for a lie; and causes those who buy into their false doctrine to live a life of setting for less). Giving the homosexual credence in any way erodes everyone's freedom because it puts an immoral/inferior relationship on par with one that is moral/superior. The reason why homosexual marriage poses a threat to traditional married couples is because the state acknowledgment of a form of relationship is equal to a relationship that it is intrinsically not equal holds traditional marriage in contempt and constitutes actual discrimination against the truth. At first the homosexual and pornographic seems really board, but in the end they prove to be extremely narrowing and destructive because they defy our natural design, decreasing love for us all. Accordingly, the homosexuals are perpetrating one of the greatest frauds on America since the inception of our Nation in the area of sex and proliferating the same permission giving beliefs that is ramping up sex trafficking. Homosexual and pornographic gospels promote an adult/self-centric reality that has given us abortion, the removal of prayer in school, no fault divorce, and a host of counter productive policies that erode our collective consciousness of conviction, proving to be disastrous and breeding misery. Those living in a Christ/child-centric reality will never accept it because it offends the express commands of the Bible. So it is simple: if the United States wants to thrive, our policies must parallel the principles in the New Testament. (The middle east will always be in turmoil because Islam is a false set of truth claims; this is why they will continue to destroy one another because they are trying to earn their way to an impersonal god; they have no

peace).

- 12. The homosexual gospel must be opposed hardcore, but that is by no means a call for persecution because we live in a Christian Nation, were are commanded to love our enemies. People who are engaging in homosexual conduct merely sin differently than those who are not they should not be mistreated. Yet, it is still hard to process that the homosexuals argue against the existence of morality, and therefore, cannot see that they have no basis to make arguments about social justice in the first place. There position is entirely illogical. The Bible is unquestionably against homosexual conduct in the same way that the state and federal obscenity laws demonstrate that the Defendants distribution of pornography through filterless devices is completely illegal. I am making social justice arguments based on Christianity, science, and the existing laws of the United States and Tennessee, not emotions and a desire to promote a selfish life style that sets a bad example for society to follow.
- 13. There are many parallels with the homosexual case to this one. Pornography involves men manipulating the sexuality of other men for money through the use of insincere porn actresses, through perpetual acts of dishonesty. It is of no surprise that the manufacture and retail Defendants here are proponents of homosexual activity and the proliferation of pornography into society. Pornography and the gospel of the homosexuals both seek to liberalize the United States culture in a manner that erodes transcultural truth, undermining the very reason the United States was formed in the first place. (Christians who left England and formed the United States in the 1600s did so to have a land where the policies were shaped by Christian ethos.) Christians want a county where the laws mirror the transcending truths of the New Testament. That is not to say that non-Christians cannot live in the United States (all Christians are hypocrites to different

degrees, and the church is a hospital for the sick, not a museum for the righteous). But the laws of the United States are virtually Constitutionally required to parallel Christianity - because it is the supreme value system - being both exclusive and inclusive as all value systems are. The Founding Father's set our Country up that way. For those who want to live in country whose laws do not mirror Christian doctrine, I respectfully recommend considering North Korea - where their President believes himself to be god, like ours does but to a different degree.



14. Governments Role here: The Defendants have collectively and individually come together and agreed to violate state and Federal child obscenity laws. The Govern and Attorney General Cooper, (whose office used to be across the hall from mine at the law firm of Bass, Berry, and Sims - where I would watch him linger around and polish his prestigious degrees all day) have failed to enforce obscenity laws against the manufacturers after receiving political contribution from these capitalistic-greed-driven conglomerates. Due to the lack of enforcement of law, our Federal and state executives have unconstitutionally converted themselves into members of the legislative branch, violating separation of powers doctrine. Concurrently, the device makers have been enabled to establish a direct and an implied partnership with predatory

pornographers, who hunt down users like myself like dogs and force us to interact with highly addictive and highly destructive pornography which destroys families, promotes sexual compulsive behavior, interferes with the practice of religion, invites an influx of systemic ills (prohibiting me for dating a real Victoria Secret supermodel - not just a digital one). By not enforcing obscenity laws against the primary Defendants, the Governor and Attorney General have purposefully violated the freedom of religion and are subject to this litigation under 1st and 14th Amendments pursuant to 42 USC sec 1983. It is my hope that the Attorney General and Governor will agree to enforce the obscenity laws against device makers becoming part of the solution, not part of the problem. I beg them to join my side. There are teenagers who are killing themselves after having pornographic images and videos of themselves posted on line because they are ashamed, only for the Defendants to turn around and to continue to distribute the porn that caused the death. I would invite the parents of such victims to sue the manufactures under wrongful death, if they balk at my demand to sell their products with filters one iota. If you oppose my demand, the evidence suggest that you are guilty of murder.

15. Prevention: Allow me to put my military prosecution hat on for a minute, as a trained prosecutor, I am not a proponent of prosecutions in this area as much as I am an ardent advocate for imposing restrictions that prevent both male and female victims. (As a Christian, I am a proponent of a mercy-centric justice system; we all can see girls trying to compete with porn stars, and they were simply designed to be treated like princesses - not objects). While serving as a Judge Advocate in a combat line unit, the primary take away was that it is always best to prevent a crime from happening than to address the problem on the back end, after the crime occurred. I want to prevent crimes before they commence because I do not want Americans

going to jail, if at all possible. (I work with the prisons and the recidivism demonstrates that the secular system is grossly failing because only Jesus Christ and the Word of God can transform hearts - the state's reformation practices are disastrously irrational and horribly pathetic.) I do not care that preventive measures will interfere with the secular states business model in the penal system. I hope and pray that prisons will close down, not filling up. I only care about people; because people matter. And protecting the truth that will keep them free matters.

THE STONE THAT WILL KILL GOLIATH

Reaching into his bag and taking out a stone, he slung it and struck the Philistine on the forehead. The stone sank into his forehead, and he fell facedown on the ground. 1 Samuel 17:49



http://fightthenewdrug.org

16. I am merely one person. But the combined voices of the youth presented here represent many voices, which should guide the Court's decision here. In the event that this match up amounts to a David Goliath scenario, the premier stone that I will sling to the permit the Court to strike down the giant comes in the form of the voice of the suffering youth (see attached testimonials from Fight The New Drug). Groups like A21 and FTND have made fighting

pornography "cool" from the prospective of the youth. Fighting for social justice is not only cool, it is necessary for our survival as a people. It is the youth who are rallying to fight against pornography because they see that adults have failed them due to greed and prideful semantical justifications - which stems from the fact that we are living in the wrong reality. Although I have been injured due to the defective design, I do not stand alone in that injury. There are millions of victims of all ages. Yet, adults have left teenagers and young adults out to dry by putting porn filled products in their hands without accountability measures and expecting them not to be overwhelmingly enticed to interact with the readily available obscenity. The devices are designed to be mobile so the gospel of "its the parents job to monitor their children" is irrational, unrealistic, arrogant, and dumb. Parents cannot be around to monitor their children 24/7. Besides pornography is so potent that parents need help monitoring themselves. None of us are immune to the dangers of porn, which I will be more than happy to prove at extensive depositions with the executives at the corporations sued here, as I will subject them to hours upon hours of the most graphic pornography on the web that they have decided to distribute.

There is nothing adult about adult content. Pornographers target testosterone saturated youth, which wrecks their potential and kills their capacity to maintain meaningful relationships. While the saying "love is love" is too shallow and false, "Porn kills love" is definitely true. I encourage all teen agers and young adults who have been impacted by pornography to join FTND, A21, and your local church that fights against sex trafficking. While cigarettes are bad for the lungs, pornography is bad for the heart, mind, spirit, and relationships. Relationships are spiritual. Porn makes having relationships with a real member of the opposite sex difficult because it restructures the reward cycle. The youth are rising up to parent the parents, who have

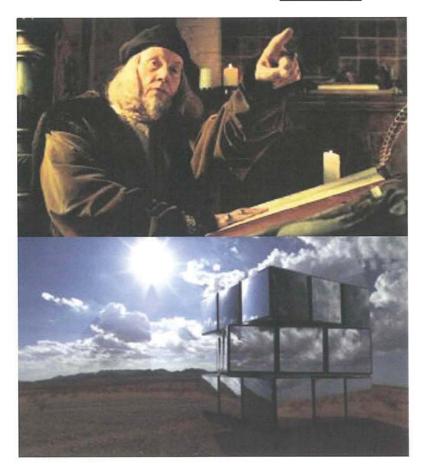
google original complaint 6/17/14 3:16 AM

placed them in a circumstance of overwhelming temptation as a result of their own jadedness. The United States was on the right track in the area of sexuality before Dr. Alfter Kinsey and Hue Hefner came along and send us spiraling on a disastrous course by telling the media what they wanted to here (that we could operate out from under the truth of the Gospel and thrive). Dr. Judith Reisman's research is squarely on point with the truth - despite having been sued in Amstadam by Playboy and subjected to three Congressional hearings - which merely confirms the porn compact's existence. We are being poisoned from the inside out, which continues to escalate. If the Court does not allow me to accomplish the relief I seek, the Court will be compounding the injury of the suffering youth and threatening its own integrity. To support me, is to protect the youth. The youth will never stand to be suppressed, but will always find a way to unite and fight back. The 12th step in the 12 step program for addiction recovery involves helping other people avoid the suffering they have experienced. A great way to for people who have been harmed by pornography to heal may involve joining groups like Fight The New Drug and A21, who fight back. The Defendant's take down is inevitable. While I am a voice of warning, the voice of the youth is the voice of the Defendant's inevitable devise.



https://www.youtube.com/watch?v=3L4YrGaR8E4

THE OLDEST TRICK IN THE BOOK "THOU LOOKEST OVER THERE"- ITS THE INTERNET

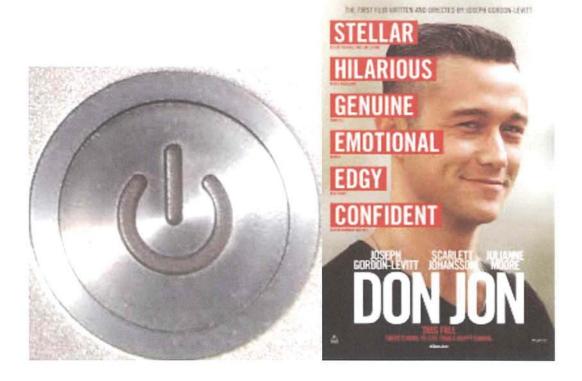


https://www.youtube.com/watch?v=XUpbS92WrLQ

18. The Defendant's, like the proponents in the same-sex marriage litigation, are guilty of perpetrating some of the greatest fraud on civilization since the inception of our Country. The manufacturers figure point to the internet for being the responsible for the porn epidemic. This misdirection has served to shape our collective conscious through deceit at societies expense. The internet is not a cube in the desert that glows. The internet is a part of a sum. The sum total is the devices sold and created by the Defendants. Without a device that powers on and off, there is no internet. The internet's very existence is dependent on the device. The products sold by the Defendants come with software that is purposed to access the internet. The exclusive ability to

google original complaint 6/17/14 3:16 AM

access the content on the internet is an essential selling point for the Defendants. Accordingly, the Defendants have an duty to account for the content they are distributing, just like all other manufacturers in the analog world, who are not any less responsible for the content they distribute. It is the duty of the Defendants, and their duty alone, to make sure their products are sold in a manner that is lawful and safe. The Defendants have a civil and criminal obligation to not violate obscenity laws. The abundance of brain science of pornography dictates as much, as well as the existing laws of the United States. The purchasing of a device is the superseding cause in a chain of events that led to my injury and the injury of millions of others. The injury was reasonable foreseeable from the stand point of the Defendants, given their knowledge of the perils of pornography on the male brain.

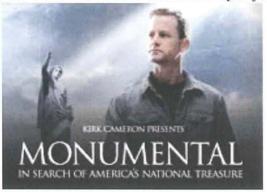


(It is merely a fact that Don Jon was released after I filed the Apple lawsuit; I didn't know about

it. Even that movie shows that the superseding cause to the start of a porn addiction begins with turning on the kinds of devices sold by the Defendant's here; the movie demonstrates that sexuality is associated with classical conditioning - which also serves to cause the entire homosexual agenda to crumble - since people are not born gay nor porn addicts but they become that way by classic conditioning).

CUTTING THROUGH LIES TO LEAD US TO A RICHER FREEDOM: UNITING US AS "WE THE PEOPLE"

Then you will know the truth, and the truth will set you free." John 8:32



19. I respectfully submit that we should all come to recognize the following about freedom. Freedom is more complex than we think it is. Freedom is birthed from truth. Without the truth there is no freedom. Freedom is not the absence of restriction or the presence of restriction.

Freedom is the presence of the right restriction. The Unites States cannot afford to adopt false truth claims that hurt myself and pose an immediate threat to families and an internalized threat to National security from the inside out. The distribution of pornography by these Defendants is a blatant violation of child obscenity laws that were promulgated by the Federal and state legislatures because pornography is unprotected and harmful speech. (See: 18 U.S.C. Chapter 110, TCA §§ 39-17-901-927, 47 U. S. C. §231). Yet, the Defendants know that pornography is addicting and illegal, but capitalize on this knowledge in bad faith by exposing our society to

addiction, without any warnings or safe guards. The Defendants are exploiting the lack of enforcement because they have twisted the thinking of the general public, only to scapegoat the internet, which is merely a part of the sum of the device that they have a duty to make safe in the first place. The Defendants have shoehorned their greed scheme into the box of first amendment protections "free speech," which is like the homosexuals attempting to shoehorn their plight into one of equal protection - it is categorically ridiculous and not supported by adequate factual or legal basis (it is supported by wicked selfishness); pornography tends to limit speech and homosexuals encourage discrimination, accomplishing the very opposite of the positions they are based because their proponents are avoid of the truth and promoting the wrong set of restrictions. If the United States continues to trade truth for a lie, we as a Nation will collapse; our laws must be continue to be shaped by the master narrative of the founding fathers (which means our policies should immediately return to accord with the Bible; if a policy conflicts with the Bible, it should be struck down, and we will open the floodgates of prosperity once more).

20. The evidence demonstrates that the Defendants have literally partnered with each other and other device makers with predatory pornographers to exploit the lack of accountability imposed upon them. These companies have falsely marketed their products as being "family friendly," only to turn around and invite predatory pornographers to hunt us down and wreck the very relationships they falsely claim to encourage, as a key selling point. The manufactures collectively agreed to refuse to sell their products on safe mode because they know that pornography is addicting and because they want all society codependent on their products. "Greed" is not King in the United States, the rule of law is, and there is no place that I'd rather make that argument than in the this venue before an the Honorable Court of the United States.

Pornographers giving out free samples is like a tobacco employee handing out free cigarettes on a school play ground. Children across the globe and Christians are being targeted, and the United States owes a responsibility to them to act by giving me the relief I seek. Our greed has created the victims, now we must clean up the mess before we slip into further darkness.

21. The world cannot afford for the manufactures here to conduct business under the value "I use you, and my happiness is the ultimate value;" we cannot allow them to get away with this immoral exploitation any longer that has polluted our cultures and threatened our families, having proliferated a sex trafficking holocaust that has lead to the development of infant farms overseas that mirror the same evil found in concentration camps. (I'm calling on all former Military veterans to stand with me in support of this lawsuit.) The American public has allowed itself to be pimped and hustled for buying into a serious of outrageously false ideals proliferated by monstrously immoral gospels put forth by the ACLU, Planned Parenthood, Hue Hefner, Dr. Kinsey, American Library Association who have more in common with the Gestapo than they do traditional American values and intrinsic truth. The manufactures have no right to cower behind such fowl philosophies, when they stand in violation of unambiguous obscenity laws and products liability statutes that were codified by state and Federal legislatures. Paramount power in the United States belongs in the hands of the Senate and the House, and the executive branch must enforce the law as written or be removed by the House and Senate immediately. I am not asking that American politics mirror Japans, where the prime ministers are impeached through a vote of no confidence regularly, but enough is enough, and I stand by the Liberty Counsel and the Honorable Judge Jeanine at Fox News demand for impeachment of King Xerxes:

http://foxnewsinsider.com/2014/06/08/judge-jeanine-obama-'your-actions-demand-

impeachment'

IT IS THE DUTY OF THE MANUFACTURE TO MAKE THEIR PRODUCTS SAFE, NOT THE JOB OF A THIRD PARTY



22. This matter can be seen as one that parallels seat beats. The manufacturers named here are in complete violation of products liability law by selling their products in a dangerous and defective manner. It is not the job of a third party to provide functions that make the manufacturers products safe for use. It is the Defendants obligation to ensure safety. If in fact there are third party companies who sell filtering products, their existence merely serves to confirm that the Defendant's are selling dangerous and defective products and that they alone must improve the safety conditions. When I bought a car from Toyota, it is Toyota's job to provide seat beats. I was not required to go out and buy safety belts from a disconnected third party, who lacked privity in the original contract. Yes, it may be a bit annoying to wear seat belts, but its a bit more annoying to fly through the windshield at 75 miles an hour on the freeway. (Every time I get a ticket for not wearing my seat belt - I thank the police officer). The United States mandates seat belt laws in light of the givenness of our nature (not to be a kill joy). Humans were not designed for car wrecks. We were also not designed to interact with pornography; it offends our design as humans. We were made for hot sex inside the confines of

the covenant marriage with one member of the opposite sex - whether Hollywood or the gays like it or not. (There is a spouse out there for all of us if we encourage this form of reality). Until we return to embracing this truth, we will be less free and headed towards major calamity. We would be wise if we put more focus on developing internal character ahead of external appearance through media stream of influence. It is the manufacturers job to provide the safety features to make their products safe for use. The findings of Witherspoon institute, Porn Harms, Yourbrainonporn.com, Dr. Carnes, Dr. Layden, Dr. Reisman, Dr. Hilton, and countless therapist and physicians demonstrations that pornography is addicting and damaging to the brain, and it is the Defendants collective responsibility to do something about this, and stop highjacking our capacity for intimacy and poisoning our relationships and potential to flourish. I expect more from Google.

ANTICIPATION OF THE FLAWED CENSORSHIP ARGUMENT WHICH IS BASED ON A SET OF EXCLUSIVE RELIGIOUS FALSE TRUTH CLAIMS



23. Proliferation of pornography goes hand in hand with the normalization of homosexual conduct without surprise. Both pornography and homosexual conduct offend a natural design and the lead to a life of setting for less. President Lincoln was correct. All people were created

equal. There are no such thing as gay people. There are only people. And all people are born equally broken. But not all of our life style choices are equal. Discrimination on the basis of life style choice is not necessarily a vice, but an act of love and mercy for everyone. An inmate who is jailed for murder has fewer rights than someone who has not made that life style choice and is not in prison (we deter murder for everyone's good - including the murder). Its not very difficult concept to understand. If we act upon impulses and urges an have sex with someone or something, we bond with it. Whatever or whoever we have sex with, we bond with - trojan products and blow up dolls included. Upon orgasm, dopamine and oxytocin release and condition our preferences and bonding capacity. This is why the horrifically counter productive and backwards Planned Parenthood's outrageous sex education program in our schools must be expelled on the basis of actual science, which supports Christian abstinence unsurprisingly. Parents in every district should sue Planned Parenthood for fraud for having mislead their children, if they engaged in premarital sexual relations with any form of injury. (Speak to local attorneys about that option).

We should all make a deliberate effort to promote sex within marriage. The seven streams of influence should return to the truth and join in that cause with a sense of purpose. To create a culture of decency, we must all be intentional. Pornography does not spice up sex, it causes impotence, hijacking male and female power, and decreases the quality of sex. The common denominator between the proponents of homosexual conduct, pornography, and total freedom is that they have an emotional problem with God and insist on suppressing the truth because they do not want to embrace the givenness of our nature. Their appeals seem broad, but prove to be damagingly narrow. They do not want to live in the world where they are not God.

Their self destructive value systems is overtly opposed by the laws of the United States at every turn. It is not enough that proponents of the self/adult centric reality do not believe in God, they have to make everyone else not believe either. Christians are compelled to fulfill the great commission, for everyone's good, not just their own. So Christians will never stop trying to invite the world to join their selfless and live giving truth claims. Prayer in school must be allowed because secular schools are unquestionably a church of human secularism, which is outrageously irrational. Christians across the globe will continue to invite the everyone to join a Christ/child-centric reality; we will never stop. We are all pushing a set of exclusive truth claims whether we like it or not. That is why the whole liberal/conservative thing is a bit retro and frames the great debate incorrectly. There are Republicans and Democrats who promote a self/adult-centric reality within the United States, for example. And there are Republicans and Democrats who push a Christ/Child-centric reality at times.

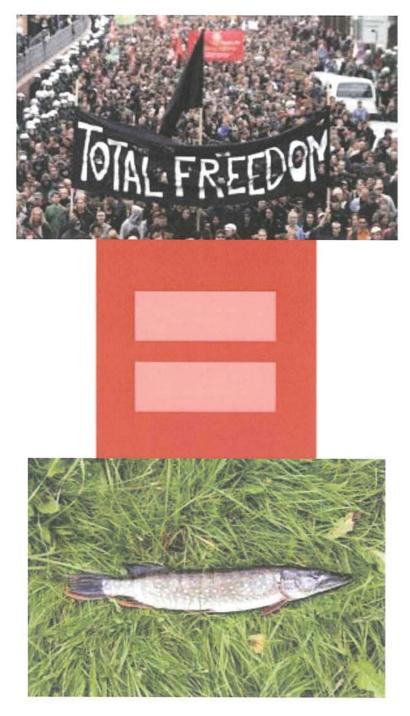
25. This no censorship policy that the Defendants will float to support their collective agreement "sounds sexy" at the surface level, but the argument is based on what amounts to a false set of religious ideals. What is religion at its core? It is a set of ideas to the bigger question. (The ACLU is a highly religious institution, so are secular humanism government agencies). The Defendants cannot command me to leave my religious ideas out of the public square, only to bring theirs into it. Such a demand is incredibly imperialistic birthed out of their own jadedness. The fact that these Defendants are going to accuse me of wanting impose a set of religious/truth claims on them is a correct assumption. But the fact that they want to impose their set of religious/truth claims on me is equally factual. So we are back to square one. If they puncture my balloon, they must puncture their own. From what vantage point do they stand on in asserting

that their truth claims regarding censorship are more superior than the one's I put forth? Is it the hermaneutics of suspicion which is a disastrously flawed value system? We are both going to be arguing a set of exclusive truth claims - so is the Court. We all have to. Both sides are making exclusive truth claims. Although "no censorship" sounds board, it proves to be horribly narrowing and limits our options. I am living proof of that. The "no censorship" argument ended my marriage and caused me to lose my child. So much for all encompassing "no censorship" argument. Where is the freedom in losing your family? The no censorship position has lead to crushing results to include a sex trafficking holocaust, which these times will be remembered by. 26. It is a result of the Christian doctrine, "love thy enemy," that we do not persecute one another in the United States for merely disagreeing with each other, as we wrestle with the policy decisions. We allow one another to live with false beliefs, when Christian ideals are in control. In Islamic countries, they do not have that privilege because those countries have the wrong set of truth claims guiding their policies - their is no debate allowed because they have the wrong set of restrictions. Muhammad was a hustler; I have seen that first hand serving in combat in Mosul Iraq. The set of truth claims that better fits with our givenness of our nature in keeping with our self-evident design is the set of restrictions that the Court should adopt - which has and always will be Christianity. I can and will make teleological and cosmological legal arguments through the process of deduction and induction as to why these Defendants must be brought to the heel regarding their unlawful distribution of pornography and why their products are dangerous and defective, but the Court should make its decision based primarily on transcultural inherent truth of what is the nature of man is. Does censorship produce the most love, the most peace, the most reconciliation or does distributing sites like Revenge Porn under the "no censorship" argument

do that? The "no censorship" policy proves to be idiotic and an part of "adult-centric reality."

27. Easily accessible pornography found on our mobile devices and lap tops creates an atmosphere of overwhelming temptation that hijacks intimacy, depletes oxytocin levels, alters the reward cycle adversely, exploits our biological make up, and damages children (see the testimonials of FTND). Men are stimulated by sight. To suggest otherwise is the continuation of the suppression of the truth. The manufactures have no right to partner with predatory pornographers, misguide us with false advertising about the "family friendliness of their products," and leave us exposed to be injected with perilous pornography addiction. Over time, Pornography steals man power and produces impotency in all men because it conditions us to need the aid of more extreme images to get off. (What kind of girl can be in a relationship with a man like that). Every female in the United States, who wants a healthy relationship with a man, should aggressively take my side on this issue and stand up for your right to have a man in your life who is not warped by porn. (See the declarations of Tiffany Leeper) I am protecting against the objectification of women and calling on men to help themselves by asking the manufacturers to help them shield their eyes from content that brings out the worst in us and hurts us. I am also helping men to have the kind of sex in real life that they have always wanted that Maximum Magazine will not get you. The scientific data demonstrates that pornography generates arousal addiction and male impotency. We cannot catch health, but we can catch illness, and to stay healthy we must be intentional, holding darkness at bay and holding one another accountable in love - as fellow brothers, sisters, sons, and daughters in the same community. Steve Jobs may be dead, but it is the time of the living to take back freedom by ending the distribution of pornography. We should do that now - this summer.

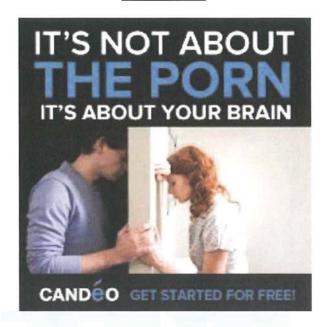
28. Like Tobacco manufacturers, these device makers had a duty to warn customers like myself about the perils of pornography, but they intentionally fail to provide these warnings because they want their customers hooked on porn, and thus codependent on their products. Even if the Defendants satisfied their duty to warn - which they did not - they would still be liable under products liability law. Pornography is looking for us, even when we are not looking for it. Through the tricks and scams of pornographers males are effectively forced into interacting with the toxic content through manipulative enticements, which appeal to our desire for sex, craving for intimacy, and longing to not live life alone. For these reasons, the Defendant's filterless policy must be sent reeling back beneath the rock from whence it came. I call upon anyone reading this to join me in this fight for freedom; no censorship policies erodes freedom. I want to see this debated nationally. To prove my point about "no censorship," imagine a policy were no one had to wear clothes in public any more? The naked bodies of the executives at Samsung, Apple, Dell, Google, Verizon, ect would make the case for why we require humans to wear clothes, and why their "no censorship" policy is both "nasty" and a "total fail." Consider Miley Cyrus's "Artistic Porno" video. Leaving nothing to the imagination erodes the specialness of that which is sacred. Even if all of the hottest people were allowed to walk around naked, nakedness would lose its specialness and with it so would the love making process that was always designed to be a gift. THE DEFENDANTS' TOTAL FREEDOM ARGUMENT INVITE CUSTOMERS TO BECOME A FISH ON THE GRASS

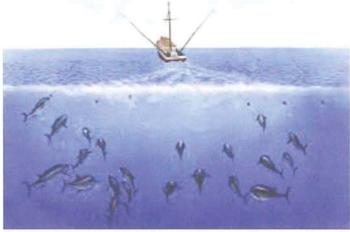


29. The anticipated argument of "Anti-censorship" and "total freedom" sounds sexy but ultimately amounts to reducing us to "a fish on the grass." A fish on the grass is not free at all. The fish will be paralyzed and will effectively die. It is only when the fish is restricted to the water that it will be able to move like lightening and flourish. The current way that Defendant's

sell their products opens the door to and invites humanity to become a fish on the grass in the area of sexuality and life in general. Total freedom appeals to our pride and makes us slave, by violating the essence of our humanness. The proliferation of viagra type drugs has correspondingly increased with exposure to pornography for good cause. Pornography does not just create crushing expectations for men and women in the area of sex, it produces sexual anorexia, sexual compulsive activity, a concrete fear of intimacy, objectification of women, and sexual dissatisfaction in the long term. Codependency of sex stimulates can form. The images we see leave an impression on us - so shielding our eyes is necessary. Real women are less clickable than porn stars, and every woman and man in the United States should help me push a very large rock back over the black hole in the cosmos if they want to promote hot and healthy sex in a functional relationship. To oppose my demand is to support inferior sex, impotency, loneliness, and personal bondage. (See the Declaration of former Porn Star Shelley Lubben). As it turns out, we simply were not designed to look at pornography, any more than we were designed to use cocaine. A short terms fix at the expense of long term happiness should be discouraged by a collective effect. If great sex is what America really wants, we should promote mystery, modesty, purity, and sex within the confines of marriage. It will take a concerted collective effort by all of us to push our society back in that direction, but we will all be a lot happier and more satisfied if we can united and do so. Doing the wrong this in easy. I don't really like working out, but I don't like being passed on for a gig for being out of shaped. It is doing the right thing that deserves our collective applause. We should foster a culture of merciful accountability that capitalistic conglomerates should ratify not assault.

TROLLING





"Among you there must not be even a hint of sexual immorality, or of any kind of impurity, or of greed, because these are improper for God's holy people" Ephesians 5:3

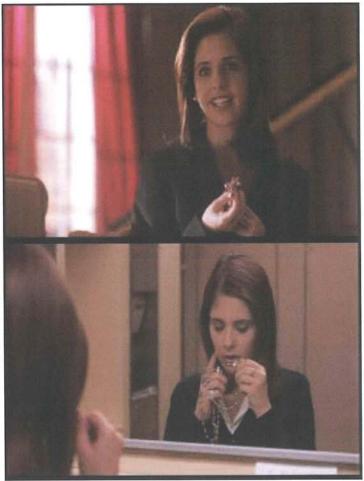
30. The Defendants and predatory pornographers stalk testosterone-saturated teenagers and younger adult males, like myself. Pornographers and the Defendants know that if they can expose their images to as many as possible, eventually they will catch someone's interest. Like trolling for fish, they know if they just keep putting out their lure, their particular brand of porn will trigger in certain viewers a specific fetish or fancy. The Defendants intentionally failed to

google original complaint 6/17/14 3:16 AM

warn us about these hooks because it benefits them to promote the falsities about porn in conjunction with the warped gospel of Planned Parenthood and the homosexuals. As Patrick Carnes says, "that which is most private is most public." Porn addiction does not stay behind closed doors. It spills out into pop culture and commercials, giving us Lady Gaga, Cosmopolitan, Miley - who we should agree to oppose for our collective best interest and not just because its bad because we say its bad. The United States needs positive roll models; Hollywood would be wise to give us those, like my fellow church member, Uncle Si at Whites Ferry Road. The distribution of pornography converts its victims into stimulation addicts, deviant thrill seekers, voyeurists with sexual compulsive syndrome, who are led by their glands and are hateful. (Most people I know who live in the self/adult-centric reality are hateful and led by their glands - they do not make me want to be like them). Curiosity turns to arousal, then to lust, and before we realize what has happened, we are sucked into addiction and sexual conduct that beings to condition us adversely, which makes maintaining relationships down the road more difficult.

31. This problem is especially bad in the religious communities. Believers have discover an easy way to escape the pressures of life: self-medication. All we have to do is push a button on the Defendants' devices and, at no cost, we have access to an endless supply of an incredibly potent drug. And no one knows that we are doing it, and no one said anything about the psychological and biological costs involved. We can self-medicate daily and still retain our reputation and standing in our family, church and community for a time being, until the addiction spirals, as they tend to do. The non-responsiveness of the government is direct evidence of the silent war on Christianity and an attempt to stamp it out. (A Google cell phone symbolically reminds me of the cocaine cross in Cruel Intentions that Buffy the Vampire Slayer wore around

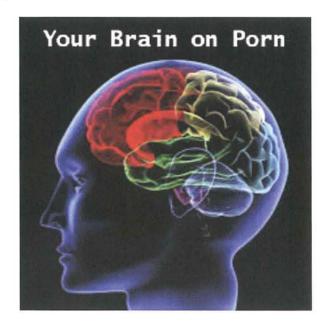
her neck). Specifically, here is how it played out for me. I have never smoked a cigarette. I have never taken an illegal drug. I rarely if ever drink alcohol. But members of the opposite sex are a palpable weakness because Christians like myself have a whole lot of oxytocin built up. We are lovers, filled with God's love. Pornographers know that and they target the religious, converting laptops and cell phones into a cocaine-type cross, after pornographic pop ups erode our ability to deny consent.



https://www.youtube.com/watch?v=l5500CG6ev0

PORN IS LOOKING FOR US

https://soundcloud.com/ghostwars/lost-in-the-crowd-1



32. Many parents believe that their children would never look at porn, which is a form of suppressed truth and self-deception birthed out of arrogance, denial, and jadedness. Yet, even if their children are not looking for porn, porn is looking for them. What society must understand is that pornographers are predators—they are aggressively pursuing each one of us, and the Defendants have established a concrete relationship with them to encourage the hunt. Pornographers will stop at nothing—even pushing, stretching and sidestepping the law—to expose as many as possible to their toxic content. Like the homosexuals, the pornographers have no basis for morality, so there are not convictions in place to stop them because they have allowed themselves to be desensitized like Nazi executioners. Like the street dealer peddling dope behind the grade school playground, these drug pushers are shameless. Make no mistake about it, the Defendants partnership with the predatory pornographers, makes them the kingpins to a criminal enterprise that could be rolled up under RICCO. As the British Prime Minister stated in November 2013, paraphrasing, "at first we believed that nothing could be done about this hopeless problem, but as soon as I began taking action, we realized that something can be done, and I will not stop until this dark world is stamped out." This lawsuit is lodged, in part, to

give a bit more weight to the heel of the Prime Minister to assist him in his stamping out the head of the serpent.



<u>DOMESTIC CASE: THE BEST INTEREST OF THE CHILDREN IS PARAMOUNT</u>
<u>T.C.A §§ 36-6-101 et seq.</u>



33. Life is like a rely race. And the current generation has a duty to set the next generation up for success and prosperity. The weight of the domestic law in all 50 states says as much. It was vital that we abolish slavery to protect the current and subsequent generations of slaves from vicious cruelty and oppression (even if we sustained an inconvenience to the current economic systems). The porn litigation has a direct parallel to the homosexual litigation insofar as both cases boil down to the the interest of children. Despite what either side argues, both the porn case and the same-sex marriage cases at the end of the day are glorified domestic cases (this is

one topic that I have tried to establish in the same sex marriage cases). In the homosexual litigation, picky points of law, such as which level of scrutiny should apply is completely ridiculous in light of common sense questions such as "what will the Court's decision signify and communicate to children about sexuality? Do we really want children looking at porn and going up believing that marrying a member of the same sex is an equal viable option under the law?" The Court's decision will influence our children's life style choice. The youth have spoken here in the form of the attached testimonials provided by FTND. Their cries for relief should not be ignored. The Court cannot disregard the symbolic influence of its decision making.

34. Both pornography and homosexual behavior interfere with procreation and detract from peace, love, and reconciliation, and push our society in direction of peril that violates our nature and wrecks our collective potential to flourish. Both pornography and homosexual rights have a lot to do with adults trying to feel less guilty about their life style choices that led them into brokenness in the first place. A transference of toxicity is taking place that we cannot afford to pass down generationally. The United States was designed to be a Christ/child-centric Country, not a self/adult-centric one. It is an act of hatred to support either the free flow distribution of pornography and homosexual deception (yet, as I have argued in the 4th Circuit, 10th Circuit, 5th Circuit, and elsewhere, if sexual orientation is given suspect class protection for purposes of the 14th amendment ALL classes of sexual orientation MUST have protection, not just the majority and the largest minority group; otherwise, our most fundamental/foundational Constitutional laws will have been interjected with hypocrisy and the United States will collapse. (I don't prefer to sound like a prophet of doom but mark my words.) I continue to stand by that argument; but unlike the homosexuals, I am not a proponent of recruiting children to engage in conduct that

will alter their sexual appetites and that is one of the many basis behind this lawsuit. The Courts of the United States must never underestimate the influence and impact its decisions have on children and the rest of society. For the Court to side with myself and immediately impose an injunction on the Defendants will send a much need message to the men and women in America and across the globe about how they should perceive and treat one another. I have vested the Court will immense power to serve in the abolition of sex trafficking and ask that it take the opportunity by the horns and become a modern day abolitionist.

35. Sex is special. It is sacred. It is precious. And so are the daughter of the United States. And any man who is a real man will stand in this gap with me in defense of their honor, instead of cowardly joining some liberalized bandwagon of self-absorption that unlawfully prioritizes the convenience of adults over the best interest of children due to some nefarious atheistic ideal set that is calculated to make select corporations additional income. Humans are more than just a bundle of chemicals. We are more than just animated pieces of meat that greedy companies can exploit. We are not merely creatures of instinct. We are beautifully designed, wonderfully made, sons and daughters of the Most High God, who are exploding with the capacity for creativity, passion, and life. Here is a song I wrote after working with sex trafficking victims: https:// soundcloud.com/ghostwars/mercy. I share it merely to demonstrate that I cannot help but create things - not to impress anyone; the song is not for you. We are imaginative treasures capable of being blessed. We have seeds within us that could bring forth evil or good, depending on which seeds we allow to be watered. The source that we tap into will determine the course of our future. The laws and policies of the United States must reflect this objective reality, and the filtering system I seek should immediately be imposed for the sake of social justice.

36. For anyone in the media, in government, or in the device making field to oppose me is to admit to being a proponent of sex trafficking. There are only a few key players, who at at the helm of this sex trafficking racket, who must be held accountable. Our Country has suffered enough humiliation and embarrassment because of horrific decision to endorse racial slavery. To oppose me is to tear open the wound of our Nations most egregious scar (just like the Homosexuals are by dastardly equating their behavior based plight to race, when it is not; the African American community should be appalled at the homosexual's attempts to ride on the backs of slaves to accomplish immoral ends that are predicated on the philosophy of "the ends justify the means"). Racial slavery, like sex slavery, were both predicated on economic justifications. Yet, we the people of the United States must collectively oppose and resist all forms of slavery, even if it presents a momentary apprehension of an inconvenience on our economic systems. The 13th Amendment commands as much. The economy will get over it, and actually improve, just like it did when we abolished slavery, and later instituted the Civil Rights Act of 1964. History has repeatedly taught us that only a moral capitalistic society can survive. Character development must be made paramount in influential policies. If the implementation of the filtering system saves one girl from being sex trafficked, if it prevents one family from divorce, if it prevents one more young person from having a testimonial like the ones found in the FTND document, then it is worth it. We should all do our part to end suffering, not encourage it. The manufactures will not go belly up by the implementation of my reasonable and sensible demand. Donna Rice Hughs organization "Enough is Enough" says it all.

IF YOU WANT TO KILL A SNAKE, CUT ITS HEAD OFF

And the LORD God said to the serpent, "And I will put enmity between you and the woman, and between your offspring and hers; he will crush your head, and you will strike his heel." Genesis

3:15

- 37. Sex trafficking, pornography, strip clubs, homosexual marriage, child molestation is all part of the same part of a wicked seamless interconnected continuum. At the head of this snake is the manufacturers of devices that connect to the web. The best way to kill a snake is to cut its head off. That is what this lawsuits purposes to do under the straight forward principles of tort law. The superseding cause of the injury in a chain of events was the failure of the Defendants to comply with products liability law and obscenity law. (The Direct TV commercials help explain the concept of superseding causality for purposes of tort law to the general public: "Don't sell your hair to a whig shop" https://www.youtube.com/watch?v=KoG0O9xH6-U).
- 38. I understand that the Attorney General's office is not interested in prosecuting obscenity violations because, like in the case of the copyright act, there is so many violations taking place that prosecuting "one offs" would not have the desire deterrence effect. (It would be like a vehicle stuck in mud smearing it around). I am more of a proponent prevention than I am prosecution, but this does not spare the Governor and AG for their dereliction of duty. So collectively, the AG, Governor, the Court and I should use the voices in FTND testimonials as a blade to cut head of this snake off, as the first step before evaluating prosecution deterrence

becomes realistic. The head is the device makers, not the content providers. The real enemy in this case is not a set of people, it is the set of false beliefs and ideas that waters the seeds of evil in the hearts of men, which brings forth death. Failing to act makes the Government culpable of ratifying sex crimes and crimes against humanity. The Court cannot deny my motion for preliminary injunction and then expect to legitimately preside over sex crime case, when I am giving the Court an opportunity to inflict a blow to a fundamental source that fuels sex crimes.

THE DEVICE MAKERS' PRODUCT IS LIKE A PLAYBOY MAGAZINE: THE DEVICE IS LIKE BOOKENDS WITH SMUT INSIDE.





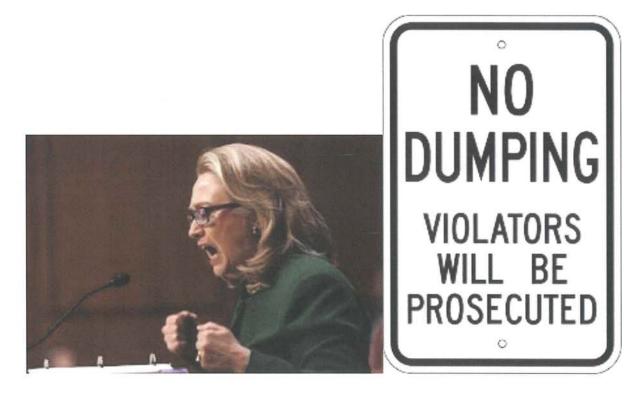
39. A cell phone and laptop is effectively like a porn magazine. The front and back of the device are like book ends, like the front and back of a playboy magazine. Inside of the device is a bundle of content, some of which is legitimate (like the sports articles which are also found in playboy) and some of which is not, like simulated rape porn of barely legal teens, who are dressed to look like children. The Defendants have a duty to NEVER distribute obscene content to children or adults. Like in the movie a beautiful mind, John Nash makes the point that there are some appetites of the mind that simply should not be fed. These Defendants have a duty to keep the door of horrors closed; to shield our eyes from content that waters seeds in our hearts that brings forth destruction. There are thousands of stories of children sexually shutting down after being exposed to torture porn websites, and we have a duty as educators, adults, and Court officers to inflict a massive blow to this sexual holocaust, pushing our world back towards innocence. I will use my own injury to advance the ball in this direction. Women are so precious and children are a gift. If our culture incentivized character development for men and women, instead of rewarding looks on the outside, our Nation and lives would be much more free. It is the truth that sets us free. By having censorship narrowness leads to spaciousness; by having "no censorship" spaciousness leads to horrible narrowness that erodes freedom. Freedom proves to

google original complaint 6/17/14 3:16 AM

be more complex than we think.



PORN AND HOMOSEXUAL SUBJECT MATTER ARE ON PAR WITH TALKS OF BATHROOM BUSINESS



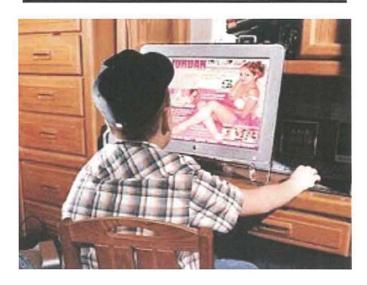
40. I'll be the first to admit that even talking about pornography is about as pleasant as

talking about "bathroom business." (As I have explained to the media, I did not wake up one day, and "say, I know what will be excellent for my life and career, I'll admit to being a porn addict before the Court at bar;" although I do prefer to be in Court than kicking in doors in Cambodia in the physical fight against sex trafficking). But that is too bad; adults created this problem, and they have to clean up the mess. Every time I reside in Manhattan (especially in the lower east side), I am always blown away about the lack of bathrooms (there should be municipal laws in place that require businesses that sell food to have bathrooms open to the public; there are homeless people routinely urinating in the streets because they have no place to go. It is dehumanizing and unjust.) Although it is not readily a crime to go to the bathroom, the law does restrict where a person may go. For example, my friend, Senator Clinton could not leisurely stroll onto the senate floor and casually defecate, as if it was policy making business as usual. The law requires the Senator to confine such natural activity to the bathroom, and not just any bathroom, the woman's bathroom. (the men's room in the Senate is much worse, as a guy trust me).

41. The same analogy applies to the porn and homosexual cases. Like using the restroom, homosexual conduct and pornography should not be illegal; it would be dehumanizing to make it so. However, in light of the givenness of our nature and the natural design of things, the law should restrict porn and homosexuality in a manner that will bring forth the more appealing fragrance of our humanness so that we can progress towards freedom. The relief sought in this lawsuit strikes the perfect balance. We should never forget that if we can improve in this one thing, we will likely improve in all things a bit more as well.

THE UNITES STATES SUPREME COURT HAS RECOGNIZED THE SECONDARY

EFFECTS OF PORNOGRAPHY ON SOCIETY



42. In regards to porn in the analog realm, the Supreme Court and other state and federal courts have recognized the harmful secondary effects of "hard-core porn shops" and other "sexually oriented businesses" that specialize in pornography and commercial nudity and upheld the right of cities and counties to enact zoning and licensing ordinances based on reports and studies of their destructive impact. There were at least forty such studies and reports of municipalities and state agencies that have documented such crime impacts and urban blight, including those reports from such diverse communities as Los Angeles, Cleveland, New York City, Phoenix, Minneapolis, Indianapolis, Seattle, Oklahoma City, Houston, Dallas, El Paso, Las Vegas, .Alliance, Ohio, Newport News, Virginia, Manatee County, Florida, Adams County, Colorado, and New Hanover County, North Carolina. As the Supreme Court said in the *Paris* Adult Theatre case in 1973, "The sum of experience...affords an ample basis for legislatures to conclude that a sensitive, key relationship of human existence, central to family life, community welfare, and the development of human personality, can be debased and distorted by crass commercial exploitation of sex. The States [and Congress] have the power to make a morally neutral judgment that public exhibition of obscene material, or commerce in such material, has a tendency to injure the community as a whole, to endanger the public safety, or in Chief Justice Warren's words, to jeopardize, States' "right. . .to maintain a decent society." *Paris Adult Theatre Iv. Slaton*, 413 US 49, at 63,69 (1973)

43. As noted by the Supreme Court in *Roth v. United States*, 354 U.S. 476, at 485 n. 15 (1957), and *New Yorkv. Ferber*, 458 U.S. 747, at 754 (1982), there is an international Treaty that can be used by U.S. and other Nations to cooperate in identifying and prosecuting obscenity offenses. The original Treaty is called "Agreement for the Suppression of the Circulation of Obscene Publications", signed at Paris, May4, 1910 In the U.S, it is reported at 37 Stat. Pt. 2, p. 1511, Treaties in Force 209 (U.S. Dept. of State), Treaty Series 559. The 1949 Protocol transferred the recording and tracking functions to the United Nations. There are now over 130 signatory countries. Pursuant to the spirit of these prosecutorial treaties, other countries can follow our standard and imposed requirements that all devices be sold with filters in effect. Fortunately, I am not calling for the prosecution of the executives of the manufactures as of yet. Prevention is preferred over prosecution. But if the executives of manufactures fail to sell their products on safe mode, they should be rounded up and prosecuted under obscenity laws by the

Federal and State District Attorney General's and District Attorney's offices.

STRENGTHENING SYSTEMS OF NATURAL ACCOUNTABILITY: A WAKE CALL TO RETURN TO CHRIST CENTRIC REALITY



When I filed the original Apple lawsuit, I crafted it in a way to provoke the liberal media so that they would make fun of it. (You're welcome). Underneath the original Apple complaint were the legal bases for the executive branch to act and for Congress to promulgate legislation to make all device makers sell their products on safe mode. Unacceptably, the United States executive and legislature have thought wise not to be responsive to my demand, which I for one will not tolerate. I will begin to hijack the President's authority, through legal avenues, and show him what leadership looks like. Yet, the filing against Apple did provoke a real leader and man of Honor, the British Prime Minister Cameron, into action. As one journalist in the United Kingdom reported:

"Last week, a man in the U.S. sued Apple for not including a default "safe mode" that prevented him from accessing porn. Chris Sevier said his Macbook led him to a serious porn addiction that resulted in depression and his family leaving him. While many initially mocked the case, the UK is now asking tech companies to do exactly what Sevier asked for, showing how serious lawmakers around the world are taking the issue of online pornography."

That response followed not because I am special. I am not (my pleadings are normally rife with typos - I think faster than I can type). I am not looking for fame. I am looking for relief to inflict a blow to sex trafficking and protect traditional marriages form this outrageous assault imposed on them so that others will not suffer as I have. The pornography/sex trafficking matter has been on the hearts of the law makers for some time, but they need a stronger catalyst to make real change occur, and this Court can give it to them for once and for all here. As a combat officer, record company CEO, I don't play footsie with responsiveness, I want results, and I want them immediately, especially in light of the testimonials collected by FTND. I do not want to hear of another incident of injury from a teenager - only to have Verizon smugly disregard the injuries it is inflicting upon the youth culture. Understandably, pornography is a hot potato issue with the House and Senate. In the House and Senaten's defense, the subject matter is completely unpleasant. I myself do not like sitting in a room and being shamed by an atheistic feminist (who opposes porn) for being born with male sexual organs, testosterone, an attraction to women, and sex drive. That is how men were designed - thank you. Even the word "porn" has triggering connotations alone. The ordering of the filter system by this Court will constitute the requisite catalyst to give my friends like Senator Hatch and Senator Corker the ammunition to lock these matters down in unambiguous federal statute for once and for all. I would prefer to see some kind of Constitutional amendment that is against sex slavery that begins with a focus on attacking the demand side, not treating a symptom through overly harsh prosecutions. There needs to be a Constitutional amendment that protects traditional marriage so that the matter can be settled forever that addresses pornography and homosexuality - to serve as a wake up call. Otherwise, America will become unbearably polarized, and a Country divvied against itself

cannot stand. Congress can regulate these matters under the commerce clause. The first amendment allows for reasonable restrictions on the time, place, and manner of speech - so it will survive all of the levels of scrutiny. And most importantly, the United States Supreme Court has found conclusively that obscenity is not protected under the first amendment in *Miller v. California*, 413 U.S. 15, at 23 (1973). For all of these reasons, the only explanation for the delay is greedy politics and a public that is living in the wrong reality. What I have created here is a monumental political opportunity for legislatures all over the world to inflict a blow to sex trafficking and protect families, if they will act on the authority I bringing forth.

45. The United States must remain at the helm of human rights and social justice. The World needs us to stay strong. Our Nation was overtly founded on Christian principles that align with God's natural design, making us in tune with song of His Creation. Other nations look to the United States for leadership because we have been historically in tune with the right reality, until we listened to Kinsey and have progressed to putting Obama in office, who has completely sabotaged our Nation, by setting the wrong tone for morality and encouraging selfishness (which is reducing our impact and eroding our freedom by opening doors to things we were not designed for). Like the fish in the grass, we merely need to return to the waters of life - the New Testament - in shaping our policies, laws, values, and convictions. There is a porn pandemic that in Kirk Cameron's words in his documentary "Monumental" is part of the problem "poisoning the soul of this Country." The reason why it is incredibly unloving to the human race to support homosexual conduct and pornography distribution is because it interferes with a natural symptom of accountability supported by transcultural principles of law. We need men to hold each other accountable and make one another better men, not molest one another through fraud,

and call it "love," because it sounds catchy and encompassing rolling off the tongue of Bill Mahur. We need men to be friends of virtue with each other, not friends of pleasure - this is especially true in the military. The laws of the United States and military regulation should NEVER encourage men to ever even open the door to such an immoral and outrageous contention that offends natural order and is prejudicial to good order and discipline. The military is all about mentorship, not men being candidates of attraction for other men. Soldiers like myself joined the military voluntarily to serve a commander in Chief, who stood as an ambassador of the God of the Bible. As soon as Obama replaced God's principles with his own personal views, our military became disasertously weaker for good cause. Just like Adultery and sleeping with a lower enlisted Soldier is a crime under Article 134 of the UCMJ; Homosexual conduct absolutely should be criminalized in the Armed Forces for the good of the Soldiers. No American Solider with any common sense and dignity would die for a mere man, who thinks he is god. He would die for a man who was standing as a representative ambassador for Jesus Christ. Obama's policies have more in common with Al Qeda's policies than they do traditional Americanism - which was Christ/child-centric. The Army values are derived directly from the Christian Faith, and Chaplains are by far the most important Soldiers in a line unit. If we want our military's superiority stand fast, all of the policies must align squarely with the will of God in the new Testament.

46. The very idea that a man sleeping with a man would be recognized as a valid life style choice by the military has resulted in a mass exodus of the best members of our Armed Forces. The incredible foolish repeal of "don't ask, don't tell" (which never should have been implemented by President Clinton either, despite his dishonorable appearament practices) has

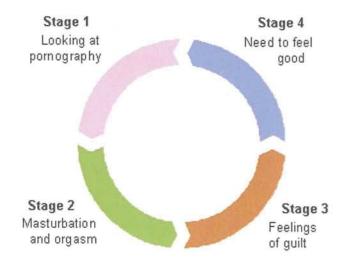
google original complaint 6/17/14 3:16 AM

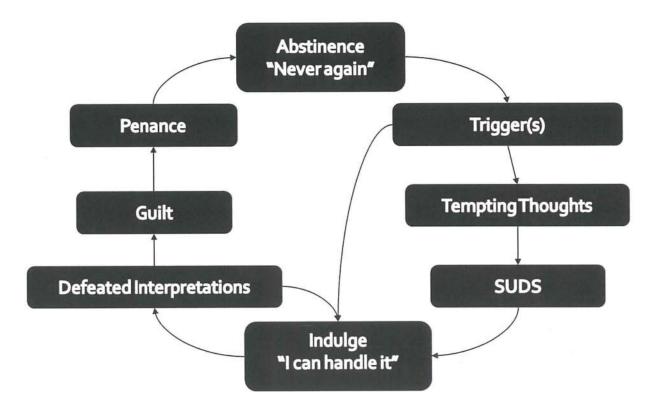
inflicted a catastrophic blow to the moral and spirit of the United States Military, and President Obama, has furthered the slippery slop that has sabotaged the United States by elevating his selfiish/adult-centric value system over the God of the Bible's. We elected him, and the legislature must remove him for being unlawful because the American majority is living in the wrong reality. The removal of gays from the military, along with drug offenders, is essential for operational success. There has to be a standard for morality in the military, and it can't be according to any man other than Jesus Christ or our Military will be in grave jeopardy, losing its anointing. Soldiers are held to higher disciplinary standards under transcultural truths for good cause. Many Soldier's join the United States military to escape the poison of a secular society, not be further exposed to it. As soon as President Obama can be removed from office, for being the most unAmerican President in the History of the United States, all gays must be removed from the military to restore order, integrity, virtue, honor, and sanity. The United States will be doing itself a favor to only elect authentic Christians to office, who look to the Bible for answers and not their personal emotions. This is true despite whether the candidate is Republican or Democrat.

.47. Sexual assault is an escalating problem in the military. To combat this, the implementation of a filtering system would allow commanders and Judge Advocates to require their Soldiers to maintain filtering programs on their personal lap tops and computers that are brought onto military installations. This would hold Soldiers to higher disciplinary standards and provide them with a source of pride and dignity that makes them stand out from the civilian world. Additionally, the filter program would help for security reasons. Many Soldiers use their personal laptops and cell phones for military purposes. While the military has heighten secure

networks like NIPER and SIPER, personal cell phones and lap tops are not secure, and yet they are used for paramount operational practices, which will escalate into a problem if cyber terrorism grows. Since pornography is married to corruption and organized crime the implementation of the filtering program could better safe guard against information leaks and security breaches in the preservation of National Security interest. Given the military connection that this litigation has, I will seek an immediate injunction to make the military stronger. If the Defendants have any sense at all, they will give me the relief I seek immediately, without mounting a fight and proving on the public record their anti-patriotic positions in the continuation of the Axis of evil.

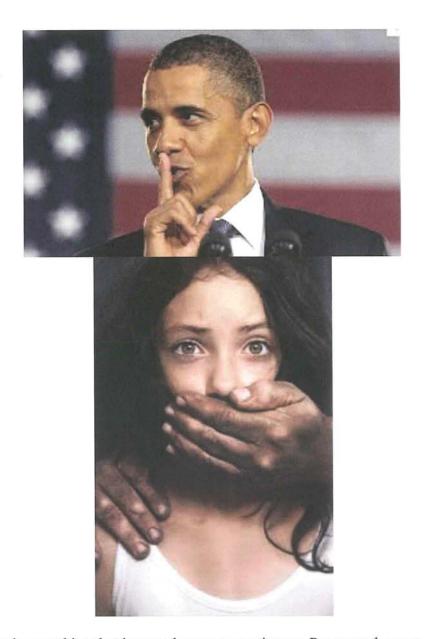
THE DEFENDANTS ARE DISTRIBUTING ADDICTION AND PROLIFERATING LIES THAT ERODE PERSONAL AND COLLECTIVE FREEDOM





48. Addiction is merely engaging in repeated activity that interferes with ones goals. Even if you want to stop, you don't because the reward cycle has been altered. Customers like myself have the right not to be introduced to addicting content in the first place. Here are some of the lies that the Defendant's products foreseeably conditioned: Lie #1Women are less than human; Lie #2 - Women are a "sport"; Lie #3 - Women are property; Lie #4 - A woman's value depends on the attractiveness of her body; Lie #5 - Women like rape; Lie #6 - Women should be degraded; Lie #7 - Little kids should have sex; Lie #8 - Illegal sex is fun; Lie #9 - Prostitution is glamorous.

THE GOSPEL OF LIES DOES NOT STOP THERE:



49. Consent is something that is spread across a continuum. Pornography warps our morals and erodes our ability to resist temptation, infringing on our consent, allowing us to be hustled, making it harder and harder for us not to visit porn that is just one click away, after a single exposure. The pornography that the Defendants support and distribute installs destructive permission giving beliefs. Here are some of the other lies that the Defendants are perpetrating onto society which erodes personal and collective freedom: (1) "I'll never get free of sex addiction" (2)"Pornography helps my marriage sex life" (3) "I can't live without my porn" (4)

"God made me this way" (5) "God won't accept me because I keep falling to temptation" (6) "All sex is good" (7) "Forbidden sex is more enjoyable" (8) "If it feels right it must be ok" (see child molestation and homosexual conduct) (9) "The Bible teaches that sex is dirty" (10) "Pornography doesn't hurt anyone" (11) "Martial Sex is boring" (12) "Have as many partners as possible before you get married and trapped" (13) "Porn will teach you how to have great sex" (14) "Getting married will stop my pornography addiction" (15) "Strangulation during sex is normal and healthy" (16) "Lust is the same as love" (17) "There is nothing wrong with cultivating and acting upon lust" (18) "Masturbation is harmless and healthy" (19) "God is unfair and unloving to restrict sex to marriage." (20) Abstinence is unhealthy and unrealistic" (21) "Lots of sex with different partners brings satisfaction and fulfillment" (22) "I want regret putting pornographic images on the web" (23) "its cool to make porn" (24) "my past sexual history will not manifest problems in my marriage" (25) "having sex with different people does not impact my ability to bond" (26) "there is no such thing as porn addiction" (27) "there is no such thing as shame addiction" (28) "Pre-marital sex is ok as long as you're planning to marry the person" (29) "Sex is Ok as long as you are committed to one another in a monogamous relationship." (30) "Eric Holder is free from checks and balances" (31) "watching porn does not hurt anyone" (32) "God doesn't care about what I do with my body" (33) "I've committed the unforgivable sin" (34) "Your body is not good enough to be sexually successful" (35) "I cannot be loved unless I can compete with porn stars, I think I'll buy sex stimulants that I saw on the late night infomercial" (36) "I cannot be loved unless I can compete with the girl in the porn video: I think I'll get lip implants, breast implants, and a nose job" (37) "the actresses in porn are having fun and want to be there - they are clearly not faking it" (37) "porn has no connection to prostitution

and sex-trafficking that is something that Chris Sevier single handedly invented to promote his EDM band and to become a famous fashion model" (38) "Google, Samsung, Apple, Dell, Verizon are against pornography and are family friendly" (39) "this situation is hopeless" (40) "there is no withdraw from porn" (41) "love is love; and porn does not kill love;" (42) "Planned parenthood's sex education program is helping society and is not a form of religious doctrine itself;" (42) "keeping Christianity out of the schools - including prayer - has really been a smart move that has made us so much happier." All of these things are patently false and outrageous and are all part of the adult centric reality that has no place in the United State's laws and policies. We need to oppose the doctrine of lies to defend liberty. We have a duty to human kind to untwist the lies that are not setting us free, they are eroding freedom and putting us into darkness and bondage. There is no freedom in the absence of truth. Our policies must be reshaped by the Courts, executive, and legislature to enable us to return to the values that are in tune with the master narrative of the founding father's, which is a euphemism for Christianity (staring with allowing prayer in school). The real truth is that pornography and greed threatens humanity from living in the ultimate reality which is heterosexual marriage with children, forming what amounts to a circle of love involving natural born children, with the God of the Bible in the center. We will no longer allow the things that are the most precious to the United States to come under attack - namely children, marriage, and faith. (And facial hair if you are from Louisiana). The Atheistic liberals on occasion have great points, moralism can open the door to a slippery slope where the adversaries of truth are marginalized and persecuted, which is patently intolerable, hypocritical, and part of the same spectrum of evil that liberalism is on. But over all, when atheistic-hedonistic individuals dogma is used to shape policy, we are converted

into a people on a compass less ship that will inevitably be dashed on the rocks of inescapable justice. There are fixed laws of the universe that we recognized at the Nuremberg trials that transcend jurisdictional boundaries that we must follow as our guide, if we want to come together as a community and a Nation. (The reason why Facebook fails is because those living in a Christ/Centric-reality and those living in self/adult centric reality don't mess so well). The manner in which the Defendants are selling their products is innately immoral and unlawful. 50. "Love is love" is not true. Authentic love is more complex, but love does involve a commitment between members of the opposite sex in a covenant relationship, who have the best interest of each other than the community at heart. The laws and policies of the United States must encourage couples to make life's journey together; and not divorce if at all possible. Anything that imposes on traditional marriage, even if symbolically, must be ardently opposed this includes the false gospels of pornography and homosexual marriage. It is unloving and hateful to suggest otherwise for objective reasons based on teleological and cosmological deduction and induction. Most of importantly of all, we know this to be true. To suggest otherwise is horribly irrational and demonstrates our incredible capacity as humans to suppress the truth about the givenness of our nature. The adoption of my proposed solution will help couples run the race of life together to the end. Who amongst us will oppose that? I hope all of us can marry a person of the opposite sex young and stay together with our spouses until the end.



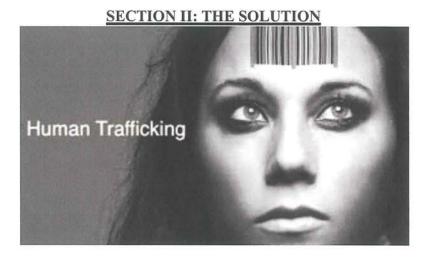
THE DEFENDANTS ARE LIKE INSIDERS ON A BANK HIEST



51. At the very least, the manufacturers and retailers are no different than insiders at a bank, who pretend to be a champion for the bank's customers, but in reality, the banker knows that a

google original complaint 6/17/14 3:16 AM

gang of robbers, who they have partnered with, are on their way to the bank to steal from their trusting customers, only to redeposit the lute back into their bank with kick backs. The Defendants have left the vaults of our hearts and minds opened and exposed to attack. The Defendant's self-serving policies invite the robbers to come in plunder. These bankers know that once the robbers have made off with the goods, they stand to the primary beneficiaries of the heist, as they ultimately receive the lions share. The American public is allowing itself to be hustled by pornographers and homosexuals fraudulent dogma. Trading truth for a lie, and ignoring fraud. One would think that as the strongest Nation in the world, the United States would not put up with being pimped like a Jon. I am here to allow the Court to give the Defendants and the Nation a wake up call.



PROPOSED SOLUTION

52. In sum, we need device makers to help us maintain a system of actual accountability, not sham accountability. Paradoxically, the filtering restrictions can enable us to progress into a richer freedom, as "we the people." I want the Governor and the Court to demonstrate leadership and require all device makers to sell their products with preinstalled filters that make reasonable

efforts to automatically block porn. If the purchaser is over 18 and wants the filter removed, they must be required to provide proof of ID at a face to face encounter with either the manufacture or the retail provider. The purchasers who want to see porn, not avoid porn, must be the required party to take the extra steps to access the content. (Try to explain how that is not fair?) The reasons why zoning laws are used to move strip clubs to the inconvenient and undesirable parts of town is because the Government has been implementing a form of accountability because it knows that strip clubs produce a systemic social ills. I am asking for something similar here which places a reasonable restriction on the time, place, and manner of speech. Despite the message of Planned Parenthood and Cosmopolitan magazine, mankind was made of sex within the confines of covenantal marriage and nowhere else. This is true despite what the philosophers like Prez Hilton and MTV spew forth to bolster ratings, maximize profits, and feel better about their contemptuous life styles that have yielded terrible results for themselves and others. The misguide ideals embraced by such individuals offend the basic tenants of molecular quantum mechanics and merely believe that we would be better off by just being lead around by our glands all of the time. Making us slaves to our own emotions and appetites is not the key to freedom, but a call for death. Yet, doing the right thing is not easy and that is why we should collectively agree to make a concert effort to push each other towards transcultural morality, not as an act of condemnation, but as an act of love for our fellow man.

53. In the instant case, I am merely placing a reasonable restriction on the time place and manner of speech that will help the globe and businesses flourish - especially in the United States. But for all of the non-lawyers reading this complaint, they should understand that the 1st Amendment Free Speech protections do not even apply here because the manufacturing and

google original complaint 6/17/14 3:16 AM

retail Defendants are not state actors. The Defendants could unilaterally zap all pornography if they wanted to (there is nothing that content providers could do about it). But I am not asking them to do that. Prohibition of porn is as problematic as prohibition against alcohol. However, porn and alcohol are similar in that they must both be strongly regulated and restricted for the benefit of every one. Raising the drinking age from 18 to 21 cut back on the number of drunk driving deaths amongst teens, as well as alcoholism. I am asking the Defendants, who are parents themselves, to shift intentionality onto those who want to see porn to have to take the steps to do so. The burden to block porn should not be on Christians and proponents of brain science; the burden should be on the arrogant perverts and depraved hearted. I am intentionally moving the Court to shield the eyes of children and adults from inadvertent contact with the endless supply of pornographic content that the Defendants are distributing into our homes and onto our persons in the form of lap top computers and cell phones 24/7. We have to ward of impulse contact in a moment of weakness in light of the realities of human nature. The spirit of the Freedom of Religion clause dictates that the choice to sin must be more deliberate, not accidental. That way, when those who go out of there way to see porn can blame themselves when they realize that they have made a terrible choice and not the Defendants. A company like Google should lead from the front on this issue and set the example. It will be a good business decision.

54. We must stop suppressing the truth of who we are as a people, if we want to progress. We have a God shaped hole in us all that when we attempt to fill it with the wrong things (like porn, cocaine, ect) to cure our emotional pain, it devastates us further and endangers the interest of those within our zone of influence. Yet, we are not just spiritual beings, we are also sexual

beings, and we should not be punished for merely being human. So, Russia has it wrong by criminalizing homosexual conduct in their civilian sector. Yet, the idea of "self accountability" is completely arrogant, unrealistic, and fails to take into consideration the biological and metaphysical make up of mankind. Gay people say that they were born gay to explain and justify their behavior. This to is a completely fraudulent statement regarding dysfunctional and lesser forms of sex. They should not be punished for engaging in consensual gay conduct, but it is an act of cruelty to encourage their conduct or assist them in spreading a gospel of destructive lies. Traditional males, cannot resist the enticing tactics executed by aggressive and abusive pornographers. We were wired for sex and to not live life alone, but context and the person we have sex with matters greatly for us all.

JOINT TASK FORCE WITH ALLIES IN THE UNITED KINGDOM, FRANCE, <u>AUSTRALIA, GERMANY, ECT</u>



Fritze 308. Holand, TSS, interpresentable of an Holmon, Mr. Seft, and Holling, MrN1744 (right), Sand Phill

55. When I filed the lawsuit, Prime Minister Cameron was responsive because he, unlike President Obama, is a Christ Follower in practice, who knows truth when he sees it. "Everyone

on the side of truth listens to me." John 18:37. Pursuant to the Prime Minister's leadership,
Google, who owns Motarola and Android, was responsive to the Prime Minister's command, and
consequently alleged to have deleted millions of child porn photos, claiming that it was now
harder for pornographic images to pop up in their "image" search engines. However, while
Google's response was somewhat applaudable - if true - it effective amounted to sham
responsiveness and the kind of misdirection that we can no longer be in the mood for, given the
rise of sex trafficking and infant farms. I am not interested in further misdirection and deception,
like that put forth by the homosexuals that their plight is one that is equated to race. We do not
have the time such flagrant dishonesty in the area of sexuality. I do not want to read new
testimonials like the ones collected by FTND. (Apple and HP have proven on the record to be
entirely hypocritical in amounting a defense for their pornographic partnership).

56. The United States needs to wake up about the realities of sex, and stop allowing itself to be lied to at the expense of our relationships. I want a system of real accountability that will provide results and push our wold back towards innocence, purity, and covenant sex inside of marriage is honored hardcore. (By the way, Google's responsiveness to the demands of the British Prime Minister constitutes an omission of guilt, which I will continue to hammer upon at every turn in this lawsuit to propel the United States into the requested joint task force with our overseas allies, starting with the United Kingdom). If anyone does not think that pornographers are trying to manipulate society into stumbling onto their websites, I would invite them to visit watersport.com, which is a urination website designed to provoke arousal. I would then respectfully invite them to then urinate on their own argument. Currently, what is under assault in the United States is traditional marriage and Christianity. To suggest that we are in engage in

civil war over sexual slavery and religion is an understatement. President Obama has been pushing the Nation away from transcending truth and should be removed from Office immediately. The world needs leaders who will turn to the Bible for answers to the great questions, like the Prime Minister has demonstrated. Prime Minister Cameron is the kind of leader that Soldiers in the United States would follow into combat because he represents someone who is Greater than he.

FACE TO FACE ENCOUNTER & THE LIST



57. Just like in a 711 store, the customer who wants to buy a smut magazine must provide proof of ID to the checkout clerk before being allowed to buy the obscene content. Here, I am asking the Court to require the Defendants to set up an accountability system where those who want to the filter deactivated must go to either the retail store and/or manufacturer to have a password issued at a <u>face to face</u> meeting to accomplish the purpose. In order to have the password issued, the customer must provide proof of ID. Those who oppose this policy cannot

have it both ways. Either the purchaser knows porn is harmful and will not take the steps to have the filter removed to protect themselves from the perils of porn on their brain, sexuality, and relationships, or the customer believes that pornography is harmless and should have no complaints about having to be the one to take additional steps to have the filter deactivated. As the proponents of homosexual conduct have proven in their cases, shame is a powerful emotion, and many men will be too embarrassed to ask permission for a deactivation code at a face to face meeting with a store clerk. What is clear about human nature is that doing the wrong thing is easy, when the choice is not made difficult. Behold, set before me mint chocolate chip ice cream from Baskin Robbins and Kale from Whole Foods, and I will find it hard to choose Kale, which is better for me in the long run. We should spur one another to do right, as an act of love. Let us come together as a community and people under Christian type policies and set the next generation up for success. Lets safe guard them from content that will destroy their lives and potential for life's best and procreation. Let us push the boys and girls of tomorrow into one another's loving arms, encouraging marriages to last. Lets set them up for success and pass the baton of freedom to our children's children. Let us no longer allow them to suffer under secular humanistic state religion as we have.

THE LIST: The manufacture and retail store will be required to provide a written warning to those who seek to have the filters removed. Also, those who want the filter removed should have their names added to a list that girl friends, wives, the police, employers, and the media can have access to. If pornography is not a problem, I am sure that those who have their names added to the list, will have no objections. If the list drives more men to bricks and mortar porn shops, I have no problem with that because it takes a huge amount of negative energy to go

to one of those places. Most men will not take it that far. But porn that is at our finger tips creates too much temptation. The fact that predatory pornographers are hunting us makes avoidance impossible.

SHOW ME THE MONEY: I AM GOING TO MAKE THE DEFENDANTS MONEY THOUGH THE IMPLEMENTATION OF A SIX TAX



59. As much as I would love the Atheistic proponents of porn to paint me as a greedy kill joy,

I am not primarily here for money first and foremost. I have not filed this lawsuit to drain the Defendants of money, as my friend Bill O'Reilly accused me of on the Factor, pursuant to his own shortsightedness in regards to the parallel Apple litigation. (I invite Mr. O'Reilly to consider the merits of this case as well; or let someone with more sense like Hannity hold a debate with Pat Truman of Porn Harms and Alan Sears of American Family Counsel). I am proposing a plan that will make the the Defendants more money than they are making now by asking them to shift their thinking from exploiting us to protecting us by complying with existing obscenity and products liability law. First of all, to be clear, it is the exclusive duty of the Defendants to make their products safe for use. So, if there are any extra cost for installing filters - which there are not - the Defendants can factor that into the total cost of the product sale. Yet, instead of charging customers to have filters installed through third party technology, as may be the case right now, the manufacturers should allow the retailers to charge a fee to have the pre-set filters uninstalled in exchange for a kick back or fee. "Ta Dah!" See how easy that was. I propose that the manufacturers and retailers impose a quasi-sin tax on the customers who want to see our sons and daughters engaging in pornographic conduct for their perverted delight. It is those who want to have access to porn who should bare any additional penalty, not those who do not want to avoid it. The Defendants are legally required to punish perversion and support good conduct. 60. If the manufacturer wants to keep the issuance of a password in house, fine by me, as long as the Court concurs. However, the manufacture could farm out the password acquisition system to retailers, like Verizon or Geek Squad at Best Buy. Greek Squad should not be charging to install filters from a some inferior third party - who lacks privity in the original contract between the manufacturer and buyer. Geek Squad should charge a fee to deactivate the filter

installed by the manufacturer, and therefore, the manufacture can get a kick back, if it wanted. (The Defendant's can't say that I didn't do them any favors in this regard). My proposal establishes a sensible and constructive form of loving accountability, but under the current program, the Defendants are effectively taxing those who want to be free from sin and addiction, while taking advantage of the general publics lack of tech savviness, rewarding defilers and the sexually deviant. In doing so, the manufacturers, retailers, and executive members are not just criminally violating child obscenity laws, they are violating products liability statutes and discriminating on the basis of religion. The Defendants are jointly violating the freedom of religion, because a state actor is involved in the form of a non responsive Governor and Attorney General, who receive political contributions from the Defendants not to enforce obscenity laws against them. Accordingly, there is a direct violation of the First Amendment to the United States Constitution. To make it easier on themselves, the Defendants should merely give me the relief I request, instead of defending their monumental role in sex slavery and the deterioration of society. Besides, products liability class action lawyers are beginning to smell blood in the water, so I would follow my advice and provide me with the relief I seek before they catch on. Victims are emerging from the shadows and speaking out, and I would be thrilled to have meetings with my friends at New York Plaintiff firms and provide a laundry list of clients so that class action litigation may commence. The Defendants' clock is ticking.

SECTION III: THE ELEMENTS

FIDUCIARY RELATIONSHIP AND VIOLATION OF PERFECT GOOD FAITH ELEMENTS

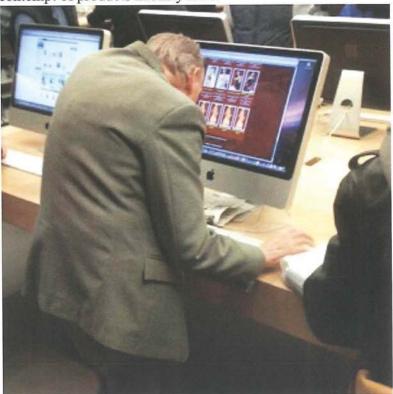
google original complaint 6/17/14 3:16 AM



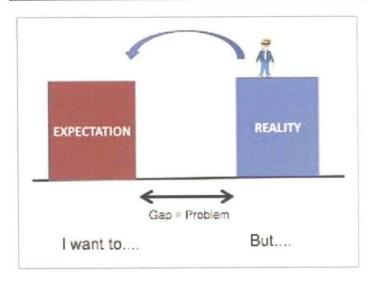
61. For purposes of products liability tort, there are a set of elements that I must establish in the complaint (1) fiduciary relationship; (2) violation of perfect good faith; (3) breach of duty; (4) instrument of control; (5) outrageousness. There was unquestionably a fiduciary relationship established between myself and the Defendants in satisfaction of this element. I do not have any technical training whatsoever regarding laptops and cell phones. I do not have a computer science degree. I relied on the technical expertise of the Defendants in purchasing products, and

they assured me that their products were safe for use through word and action. The agents at Verizon, Dell, and elsewhere, who sold me the products held themselves out as having specialized knowledge and training. Their work environment, the uniform and insignia of the employees, painted the picture of "tech experts" and "specialized knowledge," which effectively caused me to let my guard down, as they intended. (The products alone scream "technological advancement.") The Defendants are in the best position to sell their products in a safe condition, and I assumed that they would, based on their marketing campaigns, in which they portrayed themselves as proponents of community and family. The Defendants are in the best place to sell their products with filtering systems because they know their own complex products best. The manufacturers pride themselves on making products that are on the cutting edge of technology. Additionally, the Defendants violated the perfect good faith element of products liability 62. for several reasons. Due to (1) the false assurances, (2) the lack of warning, (3) the technical expertise of the Defendants, (4) lack of preset outed out filters, and (4) the Defendant's partnership with predatory pornographers perfect good faith requirement was grossly violated. It is no wonder that sex addiction clinics around the country are full and have waiting lists. Additionally, the rise of geriatric porn addiction is dramatically on the rise, which serves to symbolically violations of perfect good faith alone. I don't know anyone in America, other than those inside the circle of greed here, who want their Grandfather stumbling into pornography due to the porn compact, design defect, and aggressive tactics of pornographers. The Defendants are operating at the height of bad faith, but masquerading to have clean hands only to be completely aligned with predatory pornographers at the expense of all of mankind. The elements of a fiduciary relationship and bad faith are both present in this case, and the products sold by the

Defendant are in contempt of products liability laws.



FAILED TO OPERATE AS EXPECTED ELEMENT



64. The Defendants products failed to operate as expected. I did not expect that I could be tricked into encountering such highly addictive computer pornography purposed to overpower my senses, through a deliberate design flaw and partnership with pornography and false

marketing campaigns. I did not know that these Defendants, who held themselves out as being law-abiding-proponents of morality, would leave me vulnerable to predatory pornographers, who tactics they capitalize on. I did not know that the computer pornography the Defendants subjected me to was addicting or bad for my marriage and biochemistry. I did not expect to form an unnatural connection with the product and the propulsion of sexual deviance. I did not expect that in using the product, as it was currently designed, that I would be exposed to the disease of addiction and adverse biological alterations. I did not expect that the products would constitute a threat to personal relationships, the manufacturer and retailer had told me that the technology would improve my relationships that matter most, not destroy them. I did not expect the Defendants had an agency relationship with pornographers. I did not know how addicting this brand of pornographic content was or the kinds of impressions that it leaves on the cerebral cortex.

65. Yet, every time the Defendants sell one of their filterless smut boxes to a customer, they know that they the customer will be hunted down by predatory pornographers and exposed to obscene content that highjacks the capacity to experience intimacy. The expect this to occur. Their expectations are especially high when it comes to children, hoping they will fall prey to their misdirection tactics. The United States has recognized that there are more important things in life than making money to include following the written state and federal law and the welfare of children. The fact that children are being targeted is completely outrageous and violates the spirit of Americanism. To set the next generation of Americans up for success, I expect the Court to impose the injunction immediately.

THE ELEMENT OF CIVIL CONSPIRACY: MANUFACTURERS ARE IN BED WITH

google original complaint 6/17/14 3:16 AM

PREDATORY PORNOGRAPHERS



66. Upon information and belief, the Defendants have an implied and direct partnership with predatory pornographers. Given the Coolidge effect, the manufacturers stand to be the primary beneficiaries of the predatory pornographers tactics due to the refusal of manufacturers and retailers to sell the machines in a safe condition. The Defendants are aware that predatory pornographers employed a litany of technics that cause customers like myself to interact with pornography by trick. Pornographers intentionally use misleading domain names like watersport.com, boyz.com, and disney princess themes in targeting children and adults alike. Pornographers use mouse trapping and misleading pop ups to target males, only to over power their ability to resist desirous free samples through a series of enticements and seductive methods that exploit our biology. Meanwhile, both the manufacturers and the executive branch are turning a blind eye to this outrageous conduct because like slavery trade industry of old, the topic is unpleasant and connected with global capitalism and money making considerations under the business judgment rule on the surface. But the fact that pornography is just one click away makes self-accountability arguments unrealistic. Pornography is not a victimless crime. Even after one encounter with pornography, consent to resist can be said to have been infringed upon.

There in lies the paramount problem. The manner in which the manufactures sell their products erode the users ability to not consent to interacting with obscene content (which breeds illegal activity). Pornography is merely too abundant and too accessible online, and the pornographers are too immoral and aggressive for us to sit around and not do anything about it. Therefore, we owe to each other and to our society to have policies in place that make it harder to access. All of us want community. But our ability to have community will be impaired until we roll back immorality.

ESTABLISHING THAT THE DEFENDANTS' PRODUCTS WERE DEFECTIVE UNDER TENN. CODE ANN. § 29-28-102(2)

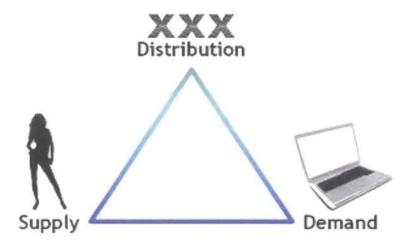
67. The Defendants sold or allow to be sold a defective product under TENN. CODE ANN. § 29-28-102(2). Given the condition the products were in when they left the plant, the Defendants foresaw my injury. TENN. CODE ANN. § 29-28-102(2), states A "defective condition" is "a condition of a product that renders it unsafe for normal or anticipatable handling and consumption." Given the Defendants' alignment with predatory pornographers and their knowledge about the addicting qualities of the pornography they forced upon me and others, the Defendants' product was grossly defective and amounted to a bundle of highly-addictive-inescapable-pornography with a some other nonaddicting content sprinkled in. The fact that (1) the Defendants were falsely advertising their products as safe, the fact that (2) the Defendants were aware of how addicting nature of the obscenity they distribute, the fact that (3) the Defendants did not provide warnings, the fact that (4) the Defendants commissioned pornographers to lure me into addiction that made me dependent on their products, the fact that (5) their was a fiduciary relationship based on the Defendants' technical expertise of cutting edge

electronics, and the fact that (6) the Defendants products never left their control, are just a few of the factors that cause the Defendants products to be categorically defective for purposes of TENN. CODE ANN. § 29-28-102(2). I contend that the Defendants knowingly, intentionally, maliciously, and deliberately sold their products in a defective manner so that I and others would become addicted to pornography and form a sexual bond with their product. The Defendants deliberately knowingly, reckless, intentionally, and foreseeably invited pornographic predators to hunt down, entice, and overwhelm my senses with intoxicating images and videos of graphic sex through unwanted forced encounters with their addicting substances in an onslaught of fraudulent seductive enticements. The true death nail in the coffin of the Defendants under TENN. CODE ANN. § 29-28-102 is that manufacture and retailers are violating obscenity laws by distributing pornography on filterless devices. If anything the executives of the corporations here should feel lucky that they are not being prosecuted. The fruit of the Defendants' violations are symbolically summarized in the following images:





BREACH OF DUTY ELEMENT



68. The Defendants have a duty to be straight forward with their customers. The Defendants cannot project a family friendly product only to keep their machinery rife with the worlds largest supply of pornography ever imposed upon mankind. This duty was breached in my case. The Defendants have a duty not to market themselves as "pro-family" only to turn around and expose those families to the ruthless pornographers who threaten the very family relationships marketed to in the first place. The Defendants have a duty not to sell products that are unreasonably intrusive and invade privacy. They breached that duty by cyber stalking their customers. Breach

is present.

INSTRUMENTALITY WITH THE DEFENDANTS CONTROL ELEMENT



69. I was injured by products that remained within the instrumentality of the Defendants' control for purposes of *Towle v. Phillips*, 172 S.W.2d 806, 808 (Tenn. 1943) I had no idea that I would be the one burdened to modify their product to make it safe for use. Such an expectation would be as unrealistic as a Tobacco executive expecting that the buyer should have to take the responsibility of removing nicotine from the cigarettes to make it not addictive. Such a contention is absurd and unlawful. The Defendants products are unique because they never really leave their control. Even after I left the store with the dangerous products, the products remained in communication with the mothership so to speak. The manufacturer and retailers regularly sent out software updates to the products I had purchased, even after they had left the store. This continuing communication demonstrates that the Defendants are in the best place to sell their products with filters because updates to the filters could be part of the software bundle that they send out. The products were effectively in exclusive control of the Defendants, when I was

injured because their false advertising and fraud had caused me to let my guard down. The measure of control that the manufacturing and retail Defendants maintain over their products after they leave the store is a factor in aggravation for the purposes of damages. The nature of the Defendants products suggest a heighten standard which they are in violation of. The Defendants are liable under aggravating factors because of their continuing control. If I start selling that concept to the top New York Plaintiff's firms, then Bill O'Reilly can legitimately label me a "rain maker."

OUTRAGEOUSNESS ELEMENT OF PRODUCTS LIABILITY TORT IS PRESENT HERE



70. The Defendants operate under the same value systems that know prostitution hubs like Backpage.com do. When the Craig's List killer incident happened, Craig's List dismantled its adult section to mitigate wrongful death litigation. All of the adult business that Craig's List had, immediately went to Backpage.com, pursuant to the principles of supply and demand. Recently, I was part of a team of former FBI agent who contacted Backpage and asked that they dismantle their adult section. They refused. Backpage knows that their website is being used to run a prostitution racket, but Backpage is making so much money from prostitution, they simply do not care whose lives they are destroying and endangering. Backpage is prepared to defend their

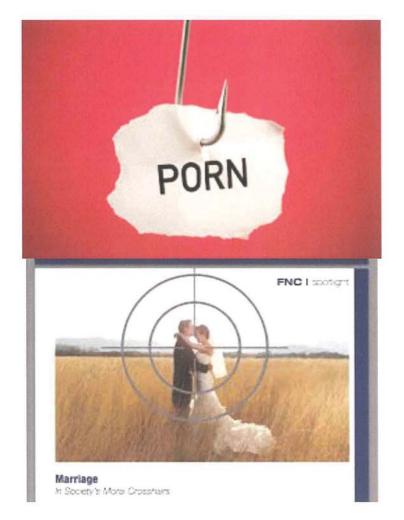
piece of the criminal misconduct in the same way Apple has been, which will serve to completely backfire. Thus, we are in the bowels of a sexual holocaust and silent epidemic because of the molestation of "free speech arguments" and "vicious greed," which is eroding our collective effectiveness and personal freedom, and preventing us from living in harmonious community with one another.

- The Defendants here will be no worse that Backpage.com if they follow the path of Apple and HP and defend their partnership with predatory pornographers. The porn compact must be brought to an end through the force of law. The fact that the Defendants are increasing the demand side of sex trafficking, placing the police in greater peril, and falsely marketing themselves as family friendly is outrageous, given the fact that they have the ability to sell their products on safe mode under an opted out system. Outrageousness is established for purposes of Doe 1 ex rel. Doe v. Roman Catholic Diocese, 154 S.W.3d 22, 39 (Tenn. 2005)(not for Freak Out Nation) and is a factor in aggravation against the Defendants in the calculation of damages. The Defendants have the technology to make their products safe, but like Backpage, they apparently do not care about society, their customers, or their families.
- 72. Given the evidence that the Defendants products (1) encourage the demise of guys; (2) increase demand for child pornography; (3) increased demand for sex traffic; (4) increased demand for prostitution; (5) increased sexual addiction; (6) increased depleted capacity to form bonds; (7) increased diminished capacity to experience intimacy; (8) increased number of destroyed marriages; (9) increased job loss; (10) increased sex crime; (11) increased shift into the sex slave industry by the world's worst cartels; (11) increased number of children from broken homes, there is no way for any person to deny that the Defendants conduct has been anything

other than so outrageous in character, so extreme in degree, as to go beyond all bounds of decency, to be regarded as atrocious and utterly intolerable in a civilized community. Miller v. Wilbanks, 8 S.W.3d 607, 612 (Tenn. 1999) (citing Bain v. Wells 936 S.W.2d at 623). As Martin Luther stated regarding lust,"we cannot keep the birds from, flying over head, but we can prevent them from nesting in our hair."Filter system I propose removes the nests and leaves a dent in the sex trafficking racket that the Defendant's greed and indifference has cultivated. Additionally, for these reasons the Defendants have violated the "civilized society," element of products liability. If the general public understood the degree to which pornography is driving sex trafficking they would not tolerate this the manufacturers partnership with the pornographers. Riley v. Whybrew, 185 S.W.3d 393, 399 (Tenn. Ct. App. 2005). Lane v. Becker, 334 S.W.3d 756, 763 (Tenn. Ct. App. 2010). The fact that pornography threatens marriages is a total breach of the most precious asset of civilized society, accordingly, the Defendant's are making society less civilized, and more like a Jerry Springer Ke\$ha show. (My pals in the media, should tell Ke\$ha that "valiant one" said that and that I still own her a drink from New Years 2012 - Zombie Shop; she'll know).

ELEMENT OF VICARIOUS LIABILITY: ALL DEVICE MAKERS, LIKE ALL BRANDS OF TOBACCO, ARE EQUALLY LIABLE UNDER AGENCY LAW





- 73. Like in the case of Tobacco litigation, if a person died of lung cancer due to the manufactures failure to warn, all of the brands that the decedent smoked would be liable under agency laws (brands that the decedent did not smoke would also be guilty due to their participation in a fraud based agreement). All brands would equally have played a roll in the wrongful death because of their collective agreement not to warn about the medical hazards of nicotine. The Tobacco manufactures were liable to warn about the addicting qualities of their product in the same ways that the retailers and manufactures are here.
- 74. On top of owning an HP and Apple computer, I owned a Motorola, Blackberry, Android, and Samsung phone all of which were purchased through Verizon. I also purchased two Dell computers and an xbox. None of these products left the manufacture with preset filters that

made reasonable attempts to block pornography. All of these devices were deliberately created in a fashion where the manufacture knew, hoped, and expected that I would be hunted down and targeted by predatory pornographers, who then forced me to interact with an become addicted to their obscene content, for the paramount benefit of the manufacture. It was not my hope to purchase these products for the purpose of engaging with toxic pornographic content. I purchased the products for business related and governmental purposes, not to have my marriage and sexual orientation maliciously infringed upon.

- 75. Whereas, Apple products exposed me to pornographic content, these other devices fueled the fire and added to the precipitating addiction and damage due to either expose to porn or the "porn compact," accordingly all of these brands are jointly and severally liable for selling dangerous and defective products. These Defendants were in league and acted in concert with all other device makers and share blame.
- 76. In conducting some basic Rule 26 Discovery in the Apple and HP case before Magistrate Judge Knowles stayed discovery for unclear reasons, I uncovered evidence that all device manufactures collectively formed an agreement to disregard obscenity laws. Upon information and belief, Apple, HP, Dell, Google, LG, Samsung ect came together and agree that if none of them followed obscenity laws, none of them would be held accountable. They formed a pornographic compact at the expense of human rights, and purchased political support through campaign contributions. They also agreed not to provide warnings that pornography was addicting and damaging. Instead, they falsely marketed their products as "family friendly." The Defendants are in possession of the technology to sell their products in a safer fashion, but they refuse to do so for purposes of greed. Now that sex trafficking demand is on the rise they are

propelling victimization and endangering law enforcement. It is completely outrageous. The groups like A21, Enough is Enough, Stop Sex Trafficking Now, Fight The New Drug, Porn Harms, ect popping up across the United States and the globe to combat the by product of irrational truth claims promoted by the ACLU and Planned Parenthood and supported by the Defendants. We must untwist the lies and hold technology companies accountable.

SECTION IV: PUBLIC POLICY CONSIDERATIONS COVENANTAL MARRIAGE ACT



77. America is in the midst of a sexual holocaust and faced with internalized threats to
National Security from within. The end result of the fight against pornography and same sex
marriage plight is that a monument in Washington needs to be built to honor traditional marriage
and their children, who have been targeted by the gospel of self that has mounted a front to
Christianity, upon which this Nation was founded on. Traditional marriage is hard enough as it is.
The laws and policies of the United States should not be crafted to encourage divorce or make it
any harder than it is. I ask that all Governors push the state legislatures to pass a Covenant
Marriage Act. When individuals get married, they should have the option of entering either a (1)

covenantal Christian marriage (Biblical marriage) or a (2) non-covenental marriage (secular marriage). Those in the secular marriage can divorce under no fault (the whole purpose of marriage is so that two Christians can help one another become more Christ like so that they can present one another in the best shape possible to the Creator). However, those who enter into a covenant marriage must agree through contract to undergo a year of Christian marriage counseling before being allowed to divorce. This act will revitalized the integrity of psychiatry, counseling, and psychology, which are all in terrible disrepair. Psychiatry has rightfully been exposed as a sham science that is more along the lines of a witch craft than actual science. Psychiatry can be used to justify unconscionable forms of evil. Psychiatry is more like a religion than it is a science at this point. The idea of a pill fixing circumstances that stem from the adherence of the wrong set of truth claims is ridiculous and unjust. The founder of ADD just announced on his death bed that ADD doesn't really exist, which pretty much says it all. The secular solutions are pathetic. They are not working. They are backfiring hardcore.

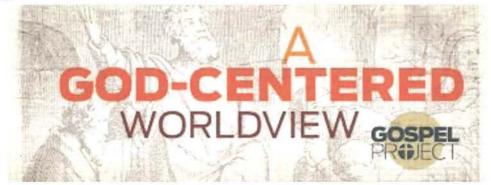
Yet, when used in the right setting, the professions of psychology, psychiatry, and therapy can have outstanding benefits, when the truth of the gospel is involved. To preserve the integrity of psychology profession, psychiatry, and therapy, the codification of the covenant marriage act will help Christian couples stay married in the midst of a culture that has managed to attack traditional marriage. The increased chance that marriages will stay together under the covenant marriage act will promote the best interest of their children and the rest of society, who has to shoulder the cost of broken homes. It will also help the therapy profession become more honorable and further centered on the truth. To support the covenantal marriage act is to support authentic love. Not irrational nonsense like "love is love" and "love is feeling." To oppose the

google original complaint 6/17/14 3:16 AM

covenantal marriage act proposal is to advocate an adult/self-centric reality in the United States that will drive us into the ground eventually.

I did not have sex with my wife until our wedding night as a matter of honor. We would 79. have entered a covenantal marriage if the act was in place when we got married. We could have worked through the injurious addiction that the filterless devices subjected me to. Instead, I had to contend with a atheistic scoundrel, like Judge Smith in the Fourth Circuit, under no fault pretenses. Judge Smith literally prides himself on the fact that he holds meetings at Strip clubs on Fridays with lawyers. How in the world can a domestic Judge with those kinds of values be trusted to act in the best interest of families, when he has no basis of morality to being with? I literally watched Judge Smith disregard the laws of Tennessee completely, on some kind of malicious power trip. But most importantly, my beef is not with Judge Smith, there are a lot of Domestic Judges in America who are far worse, my qualm is with the systematic changes in the American Justice system post Kinsey (who was a homosexual sadomasochist), which push the United States into an self/adult-centric reality and away from a Christ/child-centric one. Because we have listened to the voices Atheistic Hollywood, the morality of the United States has dwindled to a cess pool, and we are not the better for it. Our entire Nation needs to repeat and return to the truth by a push from all of us. The no fault divorce system is as arrogant as the notion of self-accountability and offends the givenness of our nature and our design. The covenantal marriage act strikes the perfect balance between freedom and order. America is living in two separate realities anyway, those who are under God's grace, and those who are not. No fault divorce violates the Free Exercise clause of the United States Constitution pursuant to the 14th amendment.

80. Currently under the no fault divorce system, marriage is literally an irrational decision given the sexually charged nature of the culture, which relentless promotes infidelity and promiscuity, while discriminating against traditional marriage. Covenantal marriage act would provide couples with more confidence that their marriage can work out - incentivizing opposite couples to marry. Like the seat belts in a car or the filtering system, the passing of the covenantal marriage act would serve as a form of accountability that would make America more stable and strong; sending us back on the quest for character. Its not a question of whether "if" a couple will experience marital problems, it is a matter of "when." And the State's should not subject Christian couples to its irrational secularized rules, when marriage was a Christian concept to begin with.



PLANNED PARENTHOOD MUST BE SHUT DOWN IMMEDIATELY FOR OFFENDING THE SCIENCE OF DOPAMINE

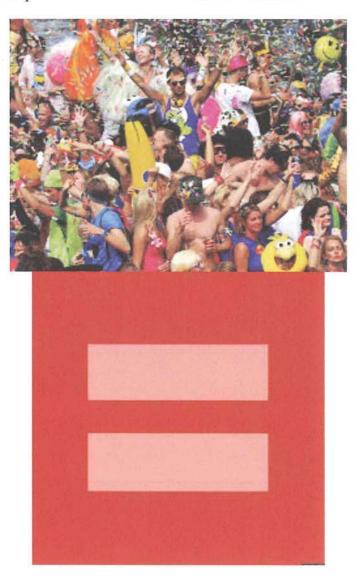
81. The toxic work of Planned Parenthood has a lot to do with collective agreement of the Defendants (Planned Parenthood is funded by Playboy). Allow me to summarize the gospel of Planned Parenthood and the Defendants: "if it feels right, do it!" But if that philosophy applied to murder, we would have no basis for criminalizing it, leaving us with a whole lot of death and destruction. The gospel of planned parenthood is everybody should sleep with as many people as

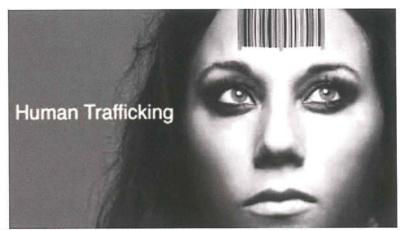
possible to garner experience before settling down. But the problem with that selfish position is, like in baseball, in marriage you play the game like your practice. Their gospel fails to take into account the realities of the depletion of oxytocin. That is, their arguments disregard the realities of not just Biblical teachings but of the science of dopamine and classical conditioning. Furthermore, the people who advocate this destructive discourse of "free sex" are those who have an emotional problem with God in the first place. All problems in the world relate back to men elevating themselves on the throne seat of God. The Planned Parenthood, in conjunction with the Defendants want to manipulate things so that others will replicate their contemptuous behavior so that they will feel less guilty about their own conduct. The Defendants are pretty much telling our society that us men should sleep with someone else's future spouse, which means that other guys are being told to sleep with their own spouse as well. It is outrageous and a form of selfhatred. This policy that the executive branch has thought wise to endorse at the suppression of the ultimate truth in the Bible is atrociously idiotic, unbearably shortsighted, and selfcontemptuous. It is no wonder the that middle eastern countries complain about Western values threatening traditional family values. The more sexual partners a person has had in the past, the harder it is for them to stay in a committed relationship in the future because they have been forced to suppress and trivialize sex, having infringed upon their reward cycle by listening to misguided voices, who never had their best interest at heart in the first place. Planned Parenthood audaciously glosses over that detail as they pass out free condoms to student and inject them with destructive lies that suppress transcending truth. To move forward as a people and a Nation, we must move back to the set of truth claims that allowed our Nation to become so great in the first place - Christianity. If any other Nation wants to replace the United States as the world's

google original complaint 6/17/14 3:16 AM

paramount super power, it can. All a country has to do is craft their laws to parallel the new

Testament principles - that's what the Constitution did. I hope that the Chinese Government pays
attention to that argument. If China wants to surpass the United States as the worlds greatest
super power, all it has to do is make its policies parallel Christianity. That has always been the
secret to the United States success, until we started listening to the voices of Atheistic liberals,
which has amounted to the blind leading the blind. All we have to do is push to return to shaping
our laws and policies to parallel the will of God in the New Testament.





ADDRESSING A HOUSE KEEPING MATTER: TO MITIGATE THE BANDWAGON CHARACTER ATTACKS IN THE PRESS

When the righteous thrive, the people rejoice; when the wicked rule, the people groan. Proverbs 29:2







83. I suspect this matter may be of interest to the general public because it serves to threaten entrenched pornography addiction and entrenched Anti-Christian secular humanist (self/adultcentric reality). While I do not care what people think of me, I do care what they think of the position I am putting forth. I would prefer if the unlawful and outrageous smear tactics of my political adversaries, like Celebrity Apprentice Winner John Rich, would not be used as a crutch by Atheists to undermine the position I am putting forth for the benefit of the greater good. My opponents will be quick to join the bandwagon of character impeachment set forth by my adversaries that I am a "mentally ill, stalker, who is in capable of practicing law." While I glory in the outrageousness of these false accusations, anyone who is interested in the truth should question there authenticity. I personally only care about social justice and what the Court has to say about the Defendants' violations. I factor in character attacks but that should not necessarily distract the public for the truth asserted. I am a whistle blower, because I believe in the rule of law and Jesus Christ as the foundation of morality, law, and reality. Accordingly, I face massive reprisal campaigns from the secular state for begin a Christ follower, and the take away for the general public is that if I can be targeted and maliciously prosecuted by the state government for promoting honesty and integrity in society, so can they. And if you are persecuted, you'll wish

that the state had returned to following Christian values, as I have pushed. I at least have the skill sets to defend myself, whereas the vast majority of people do not. The more that Christian morality is eroded in the United States, so with it goes personal freedom, even for nonbelievers, who are promoting disastrously back firing agendas that would destroy them if they got what they wanted. So to oppose me is to oppose your own best interest because I am advocating the New Testament as the foundational basis for all of our policies.

84. The "stalker nonsense" is a collaboration between the Nashville District Attorney's office, ADA Tammy Meade, and a team of dishonest civil attorneys Cyndi McKenzie Sherwood and Helen Rogers, who are driven by greed like the Defendants here. (Attached is a proposed complaint against John Rich and the 17 year old actress, Nila Fredericksen filed in Federal Court, which explains a fraction of the corruption involved for the readers enjoyment). A group of unethical attorneys in Tennessee set out to justify billing clients like Celebrity Apprentice Winner John Rich hundreds of thousands of dollars by inventing phony criminal charges to discredit myself and my allegations lodged against Mr. Rich, so he can run for Governor (as he announced on Larry King live). The secularized District Attorney's office has permitted tyrants like John Rich to lead it around by the nose ring. I am regularly targeted for having reported violations of people in positions of power and influence to the police and Ethics commissions, pursuant to my mandatory duty as a Court Officer. (I am still waiting for those who think wise to use the 17 year girl, who I do not know at all by the way, phony stalking nonsense as a sword to recognize that the fact that I have been fighting sex trafficking before she and her buddy Justus Dobbson decided to thrust themselves onto the scene. Those things do not really match up so well; it goes to show that the general public prefers to live in a matrix of deception - instead of

confronting the truth of things and advancing into a richer freedom). But the key take away from John Rich and his fan's case is that I will be more than happy to bleed these defendants out as I have Mr. Rich through the legal venues available. Also, another key take away is the realities of the corruption of the human heart, which intend on cut off the sources that feed corruption so that we have fewer people in society like John Rich (who is conservative by the way).

85. The Tennessee Supreme Court's decision that I am in capable of practicing law is direct evidence of the levels of corruption that have infiltrated our system of Government due to its adaptation of nonsensical Atheistic values, and not evidence of my incapacity. The Tennessee Supreme Court used my military service as a sword to prejudice me to protect their agents at the Board Of Responsibility, who I lodged Federal lawsuits against for fraud, waste, and mismanagement, following the same kind of targeting that the IRS executed against Christian groups. Those series of scandalous events began when I attempted to report Democratic Congressman John Mark Windle to the Inspector General while serving downrange in Operation Iraqi Freedom for his violations of DoD and Army Regulations. I faced massive reprisal by the Congressman, that went completely uncounted for under Eric Holder. The the Tennessee Supreme Court, then found it wise to capitalized on those military affairs ways that has formed what amounts to a web of evil and smelled of the same kind of persecution that Vietnam Veterans were subjected to when they returned from war. The Tennessee Supreme Court engaged in per se service discrediting misconduct pursuant to the same ideology that the Defendants' follow "the ends justify the means." To the anyone who would lend credence to the backwards Tennessee Supreme Court's outrageous abuse of process, I would respectfully submit that "as you read this

sentence, I am practicing law. If you are incapable of reading, it does not mean that I am not practicing law." Beyond that, I would instruct investigative reporters to read the pleadings I have filed in Federal Court and before the Tennessee Supreme Court; so that other's do not face the same abuse of process and malicious prosecution that I have been targeted under. The media should prioritize its duty as a watch dog over reporting sensationalism, which impeaches its integrity. The United States continues to slide down a slippery slope to darkness, confusion, and chaos. We must use our respective positions of influence in faith to push us back towards a Christ/child-centric reality.

Ridicule, violently opposition, and then its accepted as self-evident: Bring on the persecution please

Blessed are those who are persecuted because of righteousness, for theirs is the kingdom of heaven. Matthew 5:10



86. There is nothing like some good ole fashion persecution to strengthen my resolve, to prove that pornography is addicting, and to demonstrate the wickedness of the human heart. So, by all means, don't hold back: please send death threats to the address listed at the end of this complaint, so I can add them to the pile. When someone proposes truth in this manner that I am,

I expect three phases to occur: ridicule, violently opposition, and then its accepted as selfevident. I am being persecuted and prosecuted at every turn for filing this lawsuit in ways that
would shock the public if they only knew (especially from the Government), but that will not
stop me from staying the course because I care about people. I want to untwist lies. I do not
want people to suffer. I want them to thrive - this is true for even my worst of adversaries as well,
whose well being I am looking out for. I do not want people to suffer unnecessarily and the
adoption of this policy set forth here will better enable millions of people across the globe to find
a richer freedom and deeper connection with a real member of the opposite sex. Pornography
appeals to a need we have, but the more we watch it, the less of a chance the underlying need
will be met. So by all means, bring on the persecution. Strap a GPS to my leg. Falsely accuse
me of crimes. Slander me. Proliferate false truth claims. Clearly its proving my point.



https://soundcloud.com/ghostwars/if-i-die

SECTION V. TRADITIONAL COMPLAINT

THE PARTIES:

87. The Plaintiff realleges and incorporates by reference each and every allegation contained in

the preceding paragraphs as if set forth fully here. At the time of the injury I was living in Nashville Tennessee: 9 Music Square South, #247 Nashville, TN 37203. The parties are all located outside of Tennessee but reached into Tennessee and did business with me in a way that caused injury.

88. Verizon Inc. is headquartered at 1 Verizon Way Maple Ave, Basking Ridge, NJ 07920. It is incorporated in that state. And can be served at that address. Verizon was the retail store that sold me products from Samsung, Google, Blackberry, and Android. Verizon not only failed to warn, they provided false misleading statements that the products were "family friendly." Verizon allowed me to leave their store with products that they knew were dangerous and defective and would exposed me to the tactics of predatory pornographers.

89. Samsung Inc. is headquartered in the United States at 85 Challenger Rd. Ridgefield Park, NJ 07660. Samsung products were sold filterless as part of the porn compact with Apple and other device makers. Samsung's partnership with predatory pornographers compounded and caused my injury through their illegal distribution of obscene material,

90. Dell is headquartered at 1 Dell Way, Round Rock, TX 78682. Dell products were sold filterless as part of the porn compact, which exposed me to obscene content through the tactics of the predatory pornographers they have partnered with, which compounded my injury 91. Motorola Mobility LLC222 W. Merchandise Mart Plaza, Suite 1800 Chicago, Illinois 60654 USA. Motorola is owned by Google. Motorola products were sold without filters as part of the porn compact in furtherance of the illegal distribution of damaging obscene content.

92. Google is located at 1600 Amphitheatre Parkway Mountain View, CA 94043 95128-2588.

Google recently has been taking some steps against porn, which amounts to an acknowledgement

that pornography is harmful and that they stand in violation of state and federal obscenity laws. However, the current condition that they sell their phones in is unsafe.

- 93. Defendant William Edwards "Bill" Haslam is Governor of the State of Tennessee. The Governor is charged with executing the laws of the state of Tennessee. This includes enforcing state obscenity laws. The Governor refused to impose obscenity laws on manufacturers of devices due to political kickbacks and an anti-religious stance. By not enforcing obscenity laws against the manufacturers, the Governor placed me in a situation where my practice of religion was infringed upon unduly. Governor Haslam is a person within the meaning of 42 U.S.C. § 1983 and was acting under color of state law at all times relevant to this complaint. Governor Haslam's official residence is in Nashville, Tennessee, within the Middle District. He is sued in his official capacity. This is not the first lawsuit in which I have attempted to make the Governor my defendant see Tanco before the 6th Circuit.
- 94. Defendant Robert Cooper is the Attorney General & Reporter of the State of Tennessee. He is sued in his official capacity because of his refusal to enforce obscenity laws against device makers led to my personal injury and interfered with my freedom of worship.
- 95. xbox is owned by Microsoft Corporation, which is located at One Microsoft Way, Redmond, WA 98052-7329, USA. xbox markets their products to children, and yet, they allow the user to connect to the web without having installed filters because they are part of the "porn compact" with Apple and the other device makers.
- 96. LG, Life's Good, is located at MobileComm 0101 Old Grove Road, San Diego, CA 92131.

 Although I did not own an LG phone, LG was part of the "porn compact" with Apple, HP, and the other device makers named here. Under vicarious liability they are liable in here.

JURISDICTION AND VENUE

- 97. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully here. I bring this action under 42 U.S.C. § 1983 and 28 U.S.C. §§ 2201 and 2202 to redress the deprivation under color of state law of rights secured by the United States Constitution. 15 U.S.C.§ 1051.
- 98. This Court has jurisdiction of the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1343 because the matters in controversy arise under the Constitution and laws of the United States and the Lanham Act. 15 U.S.C.§ 1051. This Court has personal jurisdiction over myself and Defendants through Federal question jurisdiction.
- 99. Venue is proper in this Court under 28 U.S.C. § 1391 (b)(1) and (2) because one or more Defendants reside and or was doing business in this District. The Plaintiff was residing in this District when the injury was sustained.
- 100. This Court has authority to enter a declaratory judgment and to provide preliminary and permanent injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure and 28 U.S.C. §§ 2201 and 2202.
- 101. I bring this complaint under 28 U.S.C. 1332, as the parties and myself are completely diverse in citizenship (except for the Governor and Attorney General) and the amount in controversy exceeds the minimal jurisdictional limit of \$75,000.

FACTS

102. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully here. Recently, I purchased products from the retail and manufacturer Defendants that were part of the porn compact. (I did not buy an LG product, but upon information and belief, it was part of the porn compact). Verizon in Nashville was the seller of all of the mobile devices, who sold me filterless products manufactured by Samsung, Google, Android, Blackberry, Android. An authorized electronic/computer shop sold me the dell and xbox computer that is located in Nashville, Tennessee.

103. The laptops and cell phones came with preinstalled software designed to allow the user to connect automatically to the internet. The devices were portable and were not designed for stationary use; the devices were created to be carried around on one's person. None of the products came with preinstalled software that automatically opted me out of interacting with illegally distributed obscene pornographic content.

104. Neither the retailer nor manufacturer provide me with any warning that I could be injured through using their products. They did not warn me about the perils of pornography nor of the tactics used by the predatory pornographers, who they partner with.

105. None of the Defendants provide me with any warning that I could encounter pornographic content in using their device that might decrease the quality of my life, cause addiction, and be harmful to my family. To the contrary, they marketed the devices as having the ability to enhance family relationships.

106. Yet, when the Defendants sold me the device, they were aware that it was probable that I would encounter pornography through the normal use of their product which would threaten the quality of my life, exploit my biology adversely, and interject addiction.

107. Despite this knowledge, the Defendants failed to do anything to keep me from coming in contact with the content that would have an adverse impact on my reward cycle and neurological

make up. In fact, the Defendants marketed themselves as selling family friendly products; when in reality, the manner in which the products are sold pose an imminent threat to families and relationships. The Defendants are engaging in false advertising.

108. I have the fundamental right to practice religion and to be free from unknowingly developing an addiction as a result of using the Defendant's products. For government related purposes, work related purposes, and personal family purposes, I had to own products sold by the Defendants. However, I had the right not to have obscene content distributed onto my person through the flaws in their products.

109. I have the fundamental right to not have pornography decrease the quality of my life by being exposed to obscene content as a result of the tactics of predatory pornographers who are aligned with the Defendants.

110. The Defendants are aware that males, like myself, are stimulated by visuals of sexually suggestive and illicit content that could be access in abundance on their products and impossible to avoid.

111. The Defendants were aware that my dopamine levels would be impacted adversely through force encounters with pornography that was impossible to avoid through the normal use of the device.

280. The Defendants knew that when pleasure pathways are used compulsively, a downgrading occurs in a neurotransmitter called dopamine. The Defendants were aware that porn that is accessible through their products has the potential to reset the pleasure thermostat in their costumers brains, as it did in the myself, as it destroyed my capacity for intimacy and bonding, causing the Defendants to harm the very relationships they promised to help.

- 112. The Defendants had a duty to warn of the addictions that could result from using their products.
- 113. When the Defendants sold me their products, they knew I would be forced to encounter pornographic content that would cause compulsory sexual behavior, arousal addiction, and decrease my capability to experience intimacy by hijacking my dopamine receptors.
- 114. When Verizon and Dell sold me their devices, they did not card me or to ask if I was over 18, knowing that when I used the device as intended that pornographers would hunt me down. If I was under eighteen, the Defendants would have been guilty of distributing obscenity to a minor. But the Defendants knew that it is equally a crime to distribute obscene materials to adults (materials that violate the community standard in Tennessee). The Defendants regularly violate obscenity laws by selling their the devices in dispute to minors. They simply do not care about the law or the well being of their customers, they want to make profits at all cost and have no problem engaging in false advertising because they have no center of morality. The Defendants have aggressively worked to push the United States into an adult/self-centric reality at the collective expense of our welfare.
- 115. Before purchasing products from Apple, HP, Verizon, Samsung, Android, Blackberry, and Google, I never had any kind of addiction whatsoever. I would not intentionally do something harmful to my body or molecular chemistry.
- 116. None of the parties provided any warning that the devices would be distributing pornography onto my person which would cause arousal addition, stimulation addition, sexual anorexia, fear of intimacy, sexual compulsive conduct, and decrease the quality of my life.

 117. I was tricked into interacting with pornography due to the manipulative tactics of predatory

pornographers. If the Defendants had warned me that pornography was harmful and had sold their products with preset filters, which required me to take the initiative to have the filters disabled, I would not done so. I would have had the knowledge that porn was harmful and addicting (like tobacco manufactures provide) and I would not have suffered emotional and economic losses that followed.

118. In using the device as intended, I was forced to interact with pornography by the constant pop ups that amounted to "hooks" that overly exploit a male's attraction to females. Once consent was infringed upon, it made it harder to resist engaging with pornographic content that was merely one click away at all times. The brain cannot really tell a difference between real sex and porn, which creates the kind of codependency demonstrated in the movie "Don Jon." The actual Scarlet Johansen, despite character flaws, is objectively perferable than theory of pixilated porn stars. (See Declaration of former Porn Star Shelley Lubben).

119. The purpose of porn is unquestionably vicarious sex through lonely self-gratification. Pornography is crafted so that the viewer can get off to it and and escape reality, numbing oneself through intoxicating fantasy of love and power that end up destroying both. This escapism is addicting and caused the quality of my life to deteriorate. Porn kills love. And the idea that the free flow of information creates spaciousness has demonstrated to in fact foster cataclysmic narrowness that suffocates the possibility of a maximized life, snuffing out relationships that matter. Liberty is in jeopardy due to our lack of understanding of freedom (which requires the right kind of restrictions - Christian based ones).

120. I lost my wife and child as a result of the condition in which the Defendants sold me their products.

- 121. If the Defendants had filters in place, I would not have been injured in this way and the transference of injury to those in my zone of influence would be much better off today.
- 122. Pornography is so abundantly accessible on the Defendants products that even young men with the most discipline and strongest will power are unable to resist the temptations presented to them constantly through the aggressive tactics of the pornographers, who mercilessly seek to entice the purchaser to become hooked on their obscene content. Women of the United States should not stand for this over exposure to highly sexualized content that threatens their future and future family as well.
- 123. Eventually, I did not just want to get off to porn but to have porn like experiences in real life. The paramount message of porn is prostitution. Porn conditions the viewer to skip all intimacy and get straight to the sex. But that is a violation of our natural design. We were designed for intimacy. The pornography that the Defendant's distribute condition the viewer to seek out escorts, which erodes the ability to be in a functional relationship.
- 124. Since I became was conditioned by the Defendant's pornography to desire to get the fix with women of the opposite sex, I began avoiding the dating process all together.
- 124. I discovered backpage.com, which is a hub of prostitution where females promised to provide porn like experiences. Pornography sites distributed by the Defendant's led me there.
- 125. Instead of picking up the phone to call an escort, I picked up the phone and sought help for what had obviously progressed into an escalating addiction. I practically drove to the local authorities and ask that they arrest me, since at least that would provide a form of legal accountability that the manufacturers and retailer refused to provide in bad faith.
- 126. I am living proof that computer generate pornography drives sex trafficking demand. As

google original complaint 6/17/14 3:16 AM

part of my recovery, I decided to fight sex trafficking. In doing so, I discovered that pornography was driving the demand side of sex trafficking to the point that their is an unbelievable sexual holocaust taking place throughout the world, which directly relates back to American device maker's arrogant and unlawful distribution of pornography. Instead of suiting up and kicking in doors to rescue trafficked women overseas, I have elected to use my personal experience to inflict a meaningful blow to sex trafficking through this litigation, so that no other man will have to go through the pain and suffering of losing their family due to easily accessible pornography. Some people may think that is funny, but their suppression of the truth is part of the problem. In the United States we are living in two separate and polarizing realities. They are not liberal and conservative but are "self/adult-centric reality" and "Christ/child-centric reality." The ultimate reality in life next to a relationship with Jesus Christ is family; and traditionally families are worth protecting at all cost. I have been lucky enough to receive a series of death threats after filing the Apple lawsuit, which merely proves that the human heart is wicked and needs systems of accountability in place to keep it in check.

127. The Defendants have proven that although the technology offered by the Defendants cannot save us, it can completely destroy our lives, relationships, and the ultimate reality. The porn that the Defendants are distributing hurts everyone. The Defendants should join me in the fight against sex trafficking, becoming part of the solution, not part of the problem. We should not be on opposite sides of the table on this. But a solution with teeth is demanded.

128. Pornography generates 95 billion a year: earning more than the NFL, NBA, and major league baseball combined. The United States is responsible for approximately 15 billion of that total number. Three billion of that number associates with child exploitation. Pornography is

liberalizing our National consciousness about sex for the worse, altering sexual orientations and proliferating a false set of beliefs that yields adverse classical conditioning. After viewing porn to the point where vanilla sex won't cut it any longer, viewers are dissolving into more extreme and bizarre forms of sexual charged content that is unnatural, destructive, and categorically perverted to get their fix. It is not by accident that there thousands of websites with people having sex with all kinds of machines, animals, and persons. These sights are crafted to feed differing sexual orientations that offend our natural design and leave us adversely altered. This is why if the gays are successful in having sexual orientation deemed as a protected class, all other formers of sexual variants are required to be part of that protected class - if the United States wants to remain the United States. The question is does the United States really want sexual orientation to be a protected class, like President Obama, and do we really believe that non responsiveness to the porn pandemic is not going to backfire?

CAUSES OF ACTION

129. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

130. Under existing U.S. Code sections, traffic in obscenity is a felony offense, such as Title 18 of the U.S. Code, section 1461, making it a crime to knowingly mail obscenity, even for private use, or to mail advertisements for obscenity, section 1462, making it a crime to knowingly import, exploit, or domestically ship obscenity by common carrier via computer, cell phone, xbox, ground, air, water, satellite, Internet, phone, TV, or cable, et cetera, even for private use, section 1465, making it a crime to knowingly transport obscenity, for sale or distribution, across state lines or by any means or facility of interstate or foreign commerce, plus sections 2252 and

2252, making it a crime to knowingly transport, receive, or possess child pornography within, into, or out of the United States by any means, including computer, or even possess child pornography that has been so transported or transmitted, and sections 1961 through 1969, the RICO statutes, which make it a racketeering crime for those who knowingly use an enterprise in a pattern of Federal and State obscenity or child exploitation offenses. The Defendants are lucky that they have the deep pockets to by off politicians. But they are unlucky in that I have faith in our Courts and a faith that the American public will support a push back towards policies that parallel Christianity. The Defendants are breaking the law daily. But like in the case with DOMA, the Federal Attorney General's office is total unresponsive. Fortunately, the Courts of the United States are designed to protect against break downs in the political system. There were times that I lost my cell phone and the manufacturers, like Motorola, Samsung, Google, Android, and Blackberry mailed me a new one through the post office. These devices did not have preset filters and distributed obscene pornography. Accordingly, the cell phone manufacturers here broke Federal obscenity laws by mailing and distributing obscene content through the United States post office.

131. The Supreme Court of the United States has always held that obscenity is not protected speech under the Constitution and upheld the power of Congress and State Legislatures to prohibit obscenity from the streams of commerce. As the Court said in the famous Miller case in 1973, "This much has been categorically settled by the court, that obscene material is unprotected by the First Amendment." *Miller v. California*, 413 U.S. 15, at 23 (1973). The Court held that was true even for "consenting adults." *Paris Adult Theatre v. Slaton*, 413 U.S. 49, at 57-59 (1973). Almost 25 years later, the court reminded us that "Transmitting obscenity and child

pornography, whether via the Internet or other means [such as a device sold by the Defendants], is already illegal under federal law for both adults and juveniles." *Reno v. ACLU*, 521 U.S. 844, 117 S.Ct. 2329, at 2347, n 4 4 (1997). Even if the Defendants make "a big to do" about the fact that I was over 18, when I was violated and injured by their scam, they should be counting there blessings that there is an attorney general and president in Washington, who arrogantly think that they are legislatures. However, this Court can maintain integrity of the rule of law and enforce the spirit of obscenity laws by imposing the injunction for the sake of women and children. Like slowing a projectile, the Court can prevent us from going over the ledge and send a powerful message to the culture about the way that men and women should see each other.

- 132. The "Miller Test" was announced by the court to provide judges and juries with legal guidelines for determining obscenity under both Federal and state laws. In three major cases, the Supreme Court defined obscenity and clarified that the test is one for the juries and judges to decide, consistent with the First Amendment to our Constitution. In the Miller-Smith-Pope case, the court set out the three- prong constitutional criteria for obscenity law enforcement and court decisions:
- (1) whether the average person, applying contemporary adult community standards, would find that the material, taken as a whole, appeals to a prurient interest in sex, *i.e.*, an erotic, lascivious, abnormal, unhealthy, degrading, shameful, or morbid interest in nudity, sex, or excretion; and (2) whether the average person, applying contemporary adult community standards, would find that the work depicts or describes, in a patently offensive way, sexual conduct, *i.e.*, "ultimate sexual acts, normal or perverted, actual or simulated; ... masturbation, excretory functions, and lewd exhibition of the genitals"; and sadomasochistic sexual abuse; and (3) whether a reasonable

person would find that the work, taken as a whole, lacks serious literary, artistic, political, or scientific value. *See Miller. California*, 413 U.S 15, at 24-25 (1973); *Smith v. United States*, 431 U.S. 291, at 300-02, 309 (1977); and *Pope v. Illinois*, 481 U.S. 497, at 500-01 (1987).

- 133. Unlike obscenity, Child Pornography is a more objective test, and consists of an unprotected visual depiction of a minor child under age 18 engaged in actual or simulated sexual conduct, including a lewd or lascivious exhibition of the genitals. It is a crime under Federal and State laws to knowingly make, send, receive, or possess child pornography. See 18 US.C § 2256 and 2256A; New York v. Ferber, 458 US 747 (1982), Osborne v. Ohio, 495 US 103 (1990), United States v. X-Citement Video, Inc., 115 S.Ct. 464 (1994). See also United States v. Wiegand, 812F2d 1239 (9th Cir. 1987), cert. denied, 484 US. 856 (19'67), UnitedStates v. Knox, 32 F3d 733 (3rd Cir. 1994), cert. denied, 11 5 S. Ct. 897 (1995).
- 134. In 1996, Federal code section 2252(A) was enacted to include "child pornography" that consists of a visual depiction that "is or appears to be" of an actual minor engaging in "sexually explicit conduct". Section 2252A was first upheld, as Congress intended it to apply to computer generated images that were so realistic that they could not be distinguished from actual photos of real children, in two Federal Circuits, United States v. Hilton, 167 F3d 61(1st Cir.1999), and United States v.. Acheson,195 F3 at 645 (11th Cir 1999); but the Supreme Court declared the statute invalid as applied to child pornography that was wholly generated by means of computer. Ashcroftv. Free Speech Coalition, 535 US. 234 (2002) Congress then amended that law in the PROTECT Act of 2003, Senate Bill 151, which also enacted a new section 1466A to give an even greater penalty for obscene forms of child pornography.
- 135. In addition to obscenity and child pornography, there is also a third type of pornography

that is criminalized as Harmful To Minors, which may include soft-core pornography, which may not be obscene for adults, as well as hard-core pornography that could be obscene even for adults. It is unlawful to knowingly sell or display such Harmful to Minors pornography to minor children under State laws and under Federal law as enacted in the Child Online Protection Act of 1998 (Called COPA, 47 US.C § 230). This is true even if the material is not obscene or unlawful for adults. So called "Harmful to Minors" or "Obscene For Minors" pornography is known as "variable obscenity" because the Supreme Court held that the test would be varied or modified to apply to the specific audience of minors to which it was directed or would reach. See Ginsberg v. New York, 390 US. 629 (1968), as modified by Miller, Smith, Pope, supra. See also Commonwealth v. American Book sellers Ass'n,372S.E.2d6180/a. 1988),followed,American Booksellers Ass'nv. Commonwealth of Va., 882 F2d 125 (4th Cir. 1989), Crawfordv. Lungren, 96 F3d 380 (9th Cir. 1996), cert. denied, 117 S. Ct. 1249 (1997). Under the "Millerized-Ginsberg Test," pornography is "Harmful To Minors" or "Obscene For Minors" when it meets the following three prong test, as defined by statute, and properly construed by the courts, and judged in reference to the age group of minors in the intended and probable recipient audience: (1) taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion, as judged by the average person, applying contemporary adult community standards with respect to what prurient appeal it would have for minors in the intended and probable recipient age group o f minors; and (2) depicts or describes, in a patently offensive way with respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals, as judged by the average person, applying contemporary adult community standards with respect to what would be patently offensive for minors in the intended and probable recipient age group of minors; and (3) taken as a whole, lacks serious literary, artistic, political, or scientific value for minors, as judged by a reasonable person with respect to what would have serious value as to minors in the age groups of the intended and probable recipient audience of minors.

136. In addition to criminalizing traffic in obscenity and child pornography for both adults and

minors, Congress has acted to provide further provisions to protect children from exposure to adult and child pornography, starting with COPA in 1998 to stop commercial porn Websites from showing free teaser samples of pornographic pictures on their front pages and to require an adult identifier such as a PIN or credit card number to exclude minors. The idea of giving out "free samples of porn" is no different than a Tobacco manufacturer passing out free cigarettes to children on a playground. Kids and young males are being targets, and I am asking the Court to do something about it. Congress also required federally subsidized schools and libraries to use Internet filters to attempt to restrict adult access to visual images of Obscenity, i.e. hard-core pornography, and Child Pornography, i.e. sexually explicit images of minors, and to also try to block pornography that is harmful to Minors, such as hard and soft core pornography on terminals while used by minors under 17, as part of the Children's Internet Protection Act of 2000, which was actually upheld by the Supreme Court in overruling the challenges by the American Library Association and ACLU against using filters to block pornography on Federally funded computers in public libraries and schools. United States v. American Library Ass 'n, 529U.S., 123 S.Ct. 2297 (2003). Finally, also as part of the PROTECT Act of 2003, Congress amended the Communications Decency Act of 1996, the famous CDA that began Congressional efforts to rein in pornography on the Internet, in light of the Court's 1997 decision in Reno v. ACLU, and thereby re-instituted section 223 of Title 47 of the U.S. Code to require Internet sites and providers to take good faith steps to prevent the knowing display to minors of obscenity or child pornography. Those laws, described above, defined by Supreme Court decisions, and enacted and re-enacted by Congress and then enacted by state legislatures across the Country, are available for law enforcement, in our courts, in our communities, in our lifetimes (as in

immediately). Although reigning in the ISPs is valid and Constitutional, the idea of blaming the "magical internet" is palpable misdirection in the same way that it was red herring for Hitler to blame the Jews for Germany's woes. The public at large has been duped by the greed of Capitalistic device makers and paid off politicians, who are turing a blind eye at expense of their constituents whose interest come first. Although I am a proponent of Capitalism, I am a proponent of child/Christ-centric character based capitalism, not selfish/adult centric atheistic capitalism that literally poses an internalized threat to National Security and begs for a collapse and take over by dictatorship.

- 137. It cannot be said that Congress has not given law enforcement the tools to protect the public from the harms of illegal pornography, and the intent is clear to continue to maintain and improve those laws for the good of society and the protection of victims of pornography. (It cannot be said that the Defendants do not have the technology to sell their products with preset filters, but it can be said that they are engaging in criminal misconduct, fraud, and false advertising). It has historically been essential to preserve respect for the laws of public morality, and to do as the Supreme Court said was the "right of the Nation and of the States to maintain a decent society." History has taught us that an immoral Nation that turns its back on Biblical principles and infuses hypocrisy into its laws will not survive.
- 138. In order to protect the next generation of children, women, and men from harmful pornography, obscenity laws, can be persistently and consistently enforced against all classes of offenders who violate our laws and against all classes of unprotected pornography that are prohibited by those laws. This can be done by the prosecutors and police who are charged in our communities and our Country with the duty and privilege to enforce those Federal and State laws

for the good of all our children and families.

139. But I am here as a victim myself in civil Court to do the manufacturers a favor and ward off prosecution by simply demanding that the Defendants be convinced by this Court that it means business about protecting our children and families from the malicious distribution of pornography into our homes and onto our persons through their dangerous filterless devices. The laws of the United States and Tennessee were made to be enforced, not mocked. Because the Defendants have completely disregarded their duty to protect their customers from obscene content, they communicate to our children and adults that the content obscene content really isn't that harmful to interact with. But that is not what Congress and the Courts believe regarding obscenity and products liability.

COUNT ONE: FRAUD, including FRAUDULENT MISREPRESENTATION, FRAUDULENT CONCEALMENT, FRAUD AND DECEIT, MISREPRESENTATION BY OMISSION; CONSTRUCTIVE FRAUD

140. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. For the causes of action, I will shift to speaking in third person as conditioned in Officer Candidate School, for uniformity of pleading.

141. The Defendants intentionally misrepresented to the Plaintiff a material fact in regards to the dangers of their products in so far as they allowed him to come in contact with content on their machines that damaged him. The Defendants did not inform the Plaintiff about their agency relationship with predatory pornographers. They did not mention anything at all about their knowledge of the highly addictive nature of the porn, foreseeing that the Plaintiff would inevitably be confronted with the content through the scam tactics of the pornographers who they are in bed with.

- 141. Because the Plaintiff reasonably relied on the misrepresentation that the products were safe to use, the Plaintiff continued his use of the devices, which subsequently infringed on his enjoyment of life, causing the loss of his capacity to earn a living, medical expenses, physical and mental pain and suffering.
- 143. None of the Defendants did anything to safeguard the Plaintiff from using their devices in a way that foreseeably exposed him to content that was damaging.
- 144. The Defendants falsely and fraudulently held their products out as being safe when the Plaintiff purchased the device, while knowing that the Plaintiff would come in contact with addicting content through the normal use.
- 144. The Defendants were aware of the abundance of obscene pornography that could be access through the use of their devices. Yet, none of the Defendants did anything to prevent the Plaintiff from coming in contact with the damaging and life altering content.
- 145. The Defendant engaged in fraud by not telling the Plaintiff about their relationship with predatory pornographers. They Defendants did not tell him about how using their products could inflict him with addiction and destroy his bonds.
- 146. The Defendants were well aware of the tactics of predatory pornographers to cause their customers to interact with highly addicting porn that the Defendants made readily available. The Defendants knew that these tactics were causing addiction and did nothing about it because it is in their best interest that their customers develop porn addictions, forming chemically dependent bonds with their products.
- 147. The Defendants ratified the actions of the predatory pornographers and encouraged it at all times, while withholding vital information to the customs and leaving them exposed to an

ambush on their senses, leaving their victims desensitized, wrecked, and addicted.

148. The Defendants are only out to make a buck and do not care about the well being of their customers.

COUNT TWO: PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)

149. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Plaintiff avers that the retail and manufacture Defendants, by processing, manufacturing or furnishing electronic devices that allowed unfiltered assess to addicting content that was a significant and substantial health risk to the public at large, and more particular, to the Plaintiff, which violated the Tennessee Products Liability Act of 1978, T.C.A. § 29-28-101, et seq. T.C.A. § 29-28-105 provides that manufacturers, processors, or finishers who provide products which are unreasonably dangerous are held strictly liable for any injury to a person caused by that product. 150. The Defendants knowingly sold devices that gave their customers, to include the Plaintiff, exposure to harmful content that they knew could cause addiction and undue extreme infringement onto the biological chemical predisposition adversely altering internalize constitution causing the quality of the customers' lives to diminish. The Defendants could have taken a few easy steps to protect the Plaintiff from coming in contact with unwanted materials by selling the product on "safe mode" but failed to do so because they are irresponsible, greedy, and collectively indifferent to the welfare of their customers, sincerely believing that they are above the law. (If the Defendants can take the time to install software that allows their products to connect to the internet, they can take the time to install software that permits them to comply with obscenity laws - improving the safety of their products and eradicating their false

google original complaint

advertisement.

151. As manufacturer, processor, or furnisher of a device that allowed the Plaintiff to access addicting content without warning, the Defendants processed a finished product which was unreasonably dangerous or defective pursuant to T.C.A. § 29-28-102(2)(8) inasmuch as the danger of stumbling upon pornography that causes addiction was not one that would have been contemplated by the ordinary consumer and inasmuch, as the content accessible through the use of the computers proved it to be defective or in a dangerous condition that it would not have been furnished to the public by a reasonable prudent manufacturer, processor, or furnisher.

152. The Defendants sold computers to the consumer with software to access the internet without any filters to block addicting pornography. They failed to provide the Plaintiff with any warning that viewing pornography online could be psychologically harmful and addicting, and lead to a decrease quality of life. The Defendants made intentionally misleading truth claims, as part of a pimping scheme of their own that mirrors the mindset of pornographers.

153. The devices were in an unsafe condition without having installed filtering porn software or control settings that block porn at the time it left the manufacturing plants. If they were not so greedy, dishonesty and perverted, they would have ensured that all of their products did not leave the manufacturing plant without being set to opt out pornography.

154. The Plaintiff avers that the injuries suffered were a direct and proximate result of the unreasonably dangerous or defective condition of the products created by the manufactures and the other Defendants in the absence of pre-set filters upon sale. The Defendants knew the damaging and addicting qualities of pornography and are liable and answerable to the Plaintiff for the injuries suffered.

COUNT THREE (STRICT LIABILITY) PRODUCTS LIABILITY (DEFECTIVE

DESIGN; FAILURE TO WARN) T.C.A. § 29-28-101 et seq.

- 155. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
- 156. Design defects occur where the product design is inherently dangerous or useless (and hence defective) no matter how carefully manufactured; the product failed to satisfy ordinary consumer expectations as to what constitutes a safe product.
- 157. The risks of the product outweigh its benefits.
- 158. Defendant, at all times material to this action, designed, manufactured, distributed and/or sold the dangerous laptop computers and phones and placed such product into the market.
- 159. The defective devices designed, manufactured, distributed, and/or sold by Defendant are defective and unreasonably dangerous.
- 160. The defective laptops and phones reached Plaintiff without substantial change in the condition in which the products were designed, manufactured, distributed, and/or sold by Defendant.
- 161. Defendant owed a duty of care to Plaintiff to manufacture, distribute and sell laptops, computers, and phones that were free from defects and fit for their intended purposes which complied with obscenity laws.
- 162. Defendant breached this duty to Plaintiff by failing to sell its laptops, computers, and phones that were free from defects and unfit for their intended purposes.
- 163. Plaintiff used the laptops, computers, and phones in the manner that was intended and expected by Defendant.
- 164. The defect in the laptops, computers, and phones was the direct and proximate cause of the injury and damages suffered by Plaintiff.

165. Through a collective agreement between similarly situated device makers, retailers, and pornographers, the Defendants set out to violate obscenity laws and knowingly distribute addicting pornographic content in extreme bad faith with the malicious intent of causing their customers to become codependent on their products.

166. The executive branch turned a blind eye to this violation of the law, due to political campaign contributions, which played an essential part in the injury inflicted onto the Plaintiffs.

COUNT FOUR: NEGLIGENCE PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)

- 167. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
- 168. Defendant owed a duty to Plaintiff to design, manufacture, distribute and/or sell laptops, computers, and phones that were safe and to warn Plaintiff of any defects.
- 169. Defendant breached its duty to Plaintiff by designing, manufacturing, distributing and/or selling laptops, computers, and phones that were defective, and by failing to warn of such defect. The Defendants' conduct fell below the standard of care, which harmed the Plaintiff and the public, yielding a global public health crisis. For the reasons set forth in complaint the Defendants are collectively the poster children of negligence, bad faith, and intentional depravity in the proliferation of false truth claims that pose an immediate threat to National security interest.
- 170. Defendant's breach caused Plaintiff to suffer damages.

PUNITIVE DAMAGES Tenn. Code Ann. § 29-39-104

171. Punitive damages should be award under all available legal theories for each and every

violation. Punitive damages should be awarded under Tenn. Code Ann. § 29-39-104. The defendants acted maliciously, intentionally, fraudulently or recklessly, and in concert with pornographers and other similarly situated device makers.

COUNT FIVE: BREACH OF IMPLIED WARRANTIES: 47-2-314

- 172. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
- (1) Unless excluded or modified (T.C.A. § 47-2-316), a warranty that the goods shall be merchantable is implied in a contract for their sale if the seller is a merchant with respect to goods of that kind. (2) Goods to be merchantable must be at least such as: (a) pass without objection in the trade under the contract description; and (b) in the case of fungible goods, are of fair average quality within the description; and (c) are fit for the ordinary purposes for which such goods are used; and (d) run, within the variations permitted by the agreement, of even kind, quality and quantity within each unit and among all units involved; and (e) are adequately contained, packaged, and labeled as the agreement may require; and (f) conform to the promises or affirmations of fact made on the container or label if any. (3) Unless excluded or modified (§ 47-2-316) other implied warranties may arise from course of dealing or usage of trade. 173. The Defendants breached the implied warranty of merchantability in the sale of the phones, laptop, and computers by selling the products without filters. The Defendants maliciously exposed the Plaintiff to obscene and highly addictive pornographic content, knowing that the material was highly addictive and illegal to distribute. The Defendants designed their products in such a fashion to enable this to occur, knowing that their actions would harm the Plaintiff for their personal financial benefit. Given their agency relationship with predatory pornographers

and their knowledge of the scams they would impose on the Plaintiff to become unnaturally bonded to their products at the expense of his relationship bonds of his family. The Defendants calculating agenda was the direct and proximate result of the damages sustained by the Plaintiff.

174. No where on the manufactures packaging was their any indication of any kind that the products contained the ability to inflict the Plaintiff with unwanted addictions (like there are on packs of cigarettes). The retailer not only failed to provide any kind of warning, but made false statements about the products being family friendly and harmless.

175. The goods sold to the Plaintiff were unfit for the ordinary purposes for which such goods are used. The Plaintiff wanted to use the product for business, not sexually deviant misconduct, endangering the welfare of himself and others.

COUNT SIX: UNFAIR AND DECEPTIVE TRADE PRACTICES PURSUIT TO TCA § § 47-18-101 et. seq. CONSUMER PROTECTION ACT

176. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

177. T.C.A. § 47-18-109(a)(1) creates a private cause of action for any person who suffers a loss as a result of one of the listed "unfair or deceptive acts or practices" found in T.C.A. § 47-18-104(b). T.C.A. § 47-18-109(a)(1) provides as follows: (a)(1) Any person who suffers an ascertainable loss of money or property, real, personal, or mixed, or any other article, commodity, or thing of value wherever situated, as a result of the use or employment by another person of an unfair or deceptive act or practice described in § 47-18-104(b) and declared to be unlawful by this part, may bring an action individually to recover actual damages.

178. The Defendants engaged in deceptive trade practices by leading the Plaintiff to believe that their products were safe. The Defendants made no mention whatsoever that they were exposing the Plaintiff to addicting content through their pornographic agents. The Defendants commissioned and invited their agents to cause the Plaintiff to interact with their pornographic content through a deliberate design flaw and a collective agreement.

179. In doing so the Plaintiff developed codependence and attachment to the Plaintiff's products.

This was as the Defendants wanted. As a result of this deceptive plan, the Plaintiff suffered the loss of money, property, and other things, as a direct result of the Defendants bad faith, deceptive practices, false advertising and fraud.

COUNT SEVEN: RES IPSA LOQUITUR RELATING TO PERSONAL INJURY

180. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants (individually and collectively) have a "duty" to act "reasonably."

181. It is unreasonable for the Defendants to place a burden on their customers who do not want inadvertently come in contact with pornography to have the burden to installing filtering software. It is unreasonable for the Defendants to distribute pornography into our homes and onto our persons in violation of state and federal obscenity laws. It is unreasonable for the Defendants to expect their customers to go along with their proliferation of a criminal enterprise.

182. The Defendants are aware of the amount of pornography online and how internet marketing companies are attempting to entice males to get hooked on porn. (See the Witherspoon Institute Report; Dr. Mary Layden; Dr. Reisman's research).

183. It used to be the case that it took time, money, and expense to garner pornography. Now it

and unjust circumstance created by the Defendants due to their kowtowing to the idol of greed and disregard for the publics health. Something about that scenario is inherently wrong on its face, provoking the need for judicial rectification under res ipsa. As as proven in the abolition of slavery, there is more to life than making money; their is the duty for us to take care of one another and protect our fellow man from harm, destruction, and suffering - pointing one another towards the truth. Money does not make us happy in the long run. We must help each other as a people thrive and money takes care of itself. The Defendants have an obligation to preserve the sanctity of marriage, not trample on it for personal profit through a complex perverted fraud scheme. I am as concerned for the Defendant's families as I am for everyone else's.

184. The Defendants knew or should have known that pornography was harmful speech, when they sold their products to the Plaintiff. The Defendants placed an unrealistic and undue burden on the Plaintiff.

takes time money and expense to avoid it on the Defendant's device, which is an unreasonable

185. The Defendants knew that Plaintiff is attached to beautiful women by sight, as all males are.

The Defendants took advantage of that knowledge through their porn compact with device makers and predatory pornographers, who were permitted to bombard the Plaintiff with porn hooks.

186. Requiring those who want to avoid seeing pornography to have the burden to take steps to install filters is unreasonable, unfair, and unlawful. It is not the job of the customer or a third party to ensure that the Defendants honor obscenity laws and make their products safe for use.

187. The Defendants sold their products to their customers with software that allows them to connect to the internet, as part of the normal use of their products and expectations.

188. The Defendants knew that the Plaintiff could stumble on upon content that had addicting qualities and could produce sexually compulsive behavior that would diminish the quality of the Plaintiff's life. The Defendants not only did nothing to prevent that inevitable encounter, they greatly encouraged it through withholding knowledge, through false advertising, and through false statements about the products safeness. Consent is something that is spread across a continuum, and inadvertent exposure to obscene content once can erode the ability to resist further interaction that exists only one small click away at all times. Predatory Pornographers know that - this is why they engage in mouse trapping to overwhelm the senses and the ability to resist. A wife deserves the fundamental right to have a paramount sexual monopoly over her husband's senses and desires, not ill willed exploitative pornographers.

189. The Defendants knew that it would be an easy and inexpensive fix for them to sell their products on safe mode, which would filter out illicit pornographic content and terminate the atmosphere of overwhelming temptation - closing the door on the vile tactics of predatory pornographers.

190. If the Defendants had sold their products to Plaintiff in safe mode, he would not have stumbled upon pornography and become injured.

191. None of the Defendants warned the Plaintiff of the harmful impact that porn could have on his life if he was to stumble upon it through the normal use of the device they sold him, which violates the stand of decency in the distribution of obscenity in the Nashville community.

192. The Defendants have a duty to honor child obscenity laws and their is something inherently wrong with allowing minors and adults to leave their stores with their products without filters that block obscene content that offend the community standards. After leaving the store with a

filterless product an adult or minor can be accessing torture porn websites within minutes. There is something wrong with this picture.

COUNT EIGHT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

193. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Defendants knew or should have known that all male customers, which includes the Plaintiff, are chemically and biologically designed to be attracted to females by sight.

194. The Defendants knew or should have know that the Plaintiff could accidentally stumble upon pornographic images that would hook him into the online porn world to the point of causing arousal addiction that would be mentally and emotionally disturbing.

195. The Defendants knew or should have know that the impact of such a condition could destroy the Plaintiff's family, quality of life, income producing capability, and so forth, and such destruction would be emotionally traumatic, more than a person could handle.

196. The Defendants could have easily sold its devise with filtering software installed which required the Plaintiff to take an additional step to acquire a password that was specifically designed to have the filter removed with little burden to itself.

197. The foreseeable and proximate cause of the injuries inflicted on the Plaintiff directly stem from the Defendants' failure to act.

198. The Defendants were well aware of the of damaging qualities of pornography to include the psychological damaging components, but the Defendants refused to provide any warnings to the Plaintiff of how the content assessable on their products could cause him injury. This failure to warn and protect amounts to conduct that should not be tolerated by civilized society.

199. The burden placed on the Defendants to make the requisite adjustments to keep their products from harming their customers is low. Yet, the Defendants failed to protect the plaintiff from being inflicted with addiction which lead to emotional pain and suffering and mental anguish.

COUNT NINE: TORTIOUS INTERFERENCE

- 200. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
- 201. The Plaintiff had a marital contract at the time of sale.
- 202. The manner under which the Defendants sold their products to the Plaintiff interfered with this contract, causing breach.
- 203. The fact that the Plaintiff was married at the time of the sale was known to the Defendants. The Plaintiff wore a wedding band, when he bought the products. The Plaintiff's marriage license is part of the public record, giving the Defendants constructive knowledge of his wedding.

 204. The Defendants were in a place to know that they would be distributing addicting content to the Plaintiff that would put his marriage in jeopardy. They had a secret agency relationship with predatory pornographers.
- 205. The Defendants' breach was the proximate cause that injured the Plaintiff due to the Defendant's negligence and reckless disregard for his well being.
- 206. Additionally, the Plaintiff was an Army Officer serving on title 10 jurisdiction. The pornography distributed onto the Plaintiff encouraged him to engage in adulterous/promiscuous acts. Adultery is a criminal offense under Article 134. The condition that the Defendant's were sold in prompted the Plaintiff to violate military law and breach his contact with the Tennessee

Army National Guard. The Governor is the commander in chief of the Tennessee Army National Guard because he has failed to impose obscenity laws onto the manufacturers he has engaged in service discrediting misconduct that is prejudicial to good order and discipline, and facilitated breach of military contracts.

207. the conditions of the manufacturers cell phones interfered with the Plaintiff's contract with Verizon because the products furthered an illegal enterprise and illegal contracts are unenforceable. The sale of the cell phones in a manner that violate obscenity laws and proliferate the demand side of sex trafficking made the Plaintiff a party to an illegal contract. According, the manufacturer defendants have interfered with my contract with Verizon, providing anyone who is reading this ground to break their contract with their cell phone provider until the manufacturers of device makers decide that selling their products in conformity with obscenity laws is in its financial best interests. (So attention lawyers, if you have clients who want out of their cell phone contract - here's your sign).

COUNT TEN: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

208. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

209. Defendants owed the Plaintiff a duty of care by selling him a device that would not cause him mental, physical, and emotional injuries and diminish the quality of his life.

210. The Defendants breached their duty of care by negligently, accidentally or recklessly creating a punishing, hazardous and unduly harsh living environment, by negligently, accidentally or recklessly failing to safeguard the mental and physical health and well-being of Plaintiff by selling him a device that was not set on "safe mode," and by negligently, accidentally

or recklessly failing to provide plaintiff with notice of the dangers of pornography that was accessible through the device.

211. The Defendants breach of this duty directly and proximately caused the Plaintiff to suffer damages, mental and emotional, including fear, humiliation, depression, severe physical, thrill seeking, and emotional distress in causing the quality of his life to diminish. The emotional injury was so great that it provoked hospitalization for good cause.

212. As a result, the Plaintiff has been damaged in an amount to be determined at trial.

COUNT ELEVEN: OUTRAGEOUS CONDUCT

213. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

214. The Defendants false advertising, concert effort with predatory pornographers, and knowledge of the dangers that they were subjecting the Plaintiff to was so heinous and beyond the standards of civilized decency to be classified as utterly intolerable by a civilized society. The actions were so heinous that a reasonable person would declare "outrageous!" upon the discovery of this concerted compact plan, the fraud involved, and the damage done to our world at the expense of human rights. The Defendants failures to honor obscenity laws and scape goat the internet, which is merely a part of the products makes them at the helm of a sex trafficking enterprise. The Defendants deserved to be viewed as being stationed at the helm of sexual holocaust. The Defendant's conduct has been malicious and extreme in all regards. The amount of sex prosecution violations and divorces that that could have been avoided if the products were sold with filters is nearly suffocating to contemplate - so much for total freedom of the no censorship arguments. There was a pattern of conduct, not an isolated incident as the Defendants

carried out this fraudulent plan on millions of customers repeatedly. The Defendants' conduct is so outrageous it has caused a public health crisis, moved the United States toward backwardness. interfered with religion, and presented an internalized threat to National Security interest from the inside out - eroding fundamental freedom. Despite our education and all that we have learned from history, the Defendant's have been allowed to get away with conduct that is savage and barbaric. The Defendants have played a roll in a majority of sex crimes by the suspects who got their start down a voyeuristic path after being exposed to pornography. The distribution of torture porn websites and simulated rape websites warrant the immediate prosecution of the executives of each of the manufacturers to send the message that the abuse of obscenity laws is intolerable. The United States must return to a place of decency. There are 10 year olds who are watching porn and then acting out what they saw on a neighbor. The endless reports of disciplinary problem, collected by teachers, regarding children who have been given access to porn warrants immediate responsiveness by the manufacturer. 215. The Defendant owed the Plaintiff a fiduciary duty under these sets of facts and breached

that duty. "Outrageous!" The testimonials from FTND in which the youth are crying out for relief as a result of the arrogant failures of adults is completely outrageous. The very idea that the youth is rising up to parent the adults is evidence of outrageousness on its face. I should not have to file this lawsuit at great personal expense. The laws of the United States should be enforced by the Governor and President or the legislature must have the back bone to impeach them for dereliction of duty. What kind of Soldier can respect and put his life on the line for a commander in chief, who disobeys his Constitutional oath of office? The is a web of outrageousness at work.

COUNT TWELVE: CIVIL CONSPIRACY

google original complaint 6/17/14 3:16 AM

216. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

At all times relevant to the factual allegations in this complaint, the Defendants conspired and knowingly acted in concert with the intent and understanding that they were subjecting the Plaintiff and all of their other customers to unwanted pornography addiction, that they were aware of the dangerous hazard and deliberately mislead the Plaintiff in a scam to maximize profits, that they had set out to make all customers chemically dependent on their products, that they were acting in concert with predatory pornographers to invade the their customers privacy for their own personal benefit. As such, the unlawful tortious acts of all of the Defendants undertaken in the course of, and in furtherance of this civil conspiracy are imputed to each other and each Defendant is civil liable for all of the unlawful and tortious misconduct as if they actually, physically committed or ordered the commission of such unlawful, tortious acts themselves.

217. The Defendants did not only individually and collectively agree that they would disregard obscenity laws and hide behind non-applicable first amendment ideals, they entered into a partnership with all other device makers, to include Apple and HP, agreeing in concert to disregard the law. The collective agreement between device makers to ignore obscenity laws is known as "the porn compact." The companies agreed to all ignore obscenity laws and to align themselves with predatory pornographers, while marketing their products as family friendly. The rationales behind the "porn compact" was to (1) blame the internet; (2) pay off politicians through campaign contributions; and (3) collectively agree not to honor obscenity laws so that none of them could be held accountable.

218. The Governors and Attorney generals in all of the states in the U.S. refused to enforce obscenity laws against the Defendants because device makers were continuing so much money to their political campaigns and political parties, making a mockery of the rule of law in this Nation. The refusal of the executive branch to enforce the law as written is completely outrageous and confirms their direct roll in the proliferation of a sexual holocaust which has eroded freedom in America. A complete breach down of our political system has occurred that the Honorable Courts of the United States can redeem.

COUNT THIRTEEN: BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING

219. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

220. A special relationship existed between the manufacture/retailer and the Plaintiff. Also, the Plaintiff expected the Governor and Attorney General to bother to enforce the law. The Plaintiff expected that the manufacture and retail Defendants would honor the laws, but they did not. All persons should be able to break their contact with samsung, verizon, ect because they are engaged in criminal conduct, making an illegal contract with the retailer unenforceable. (money seems to be the only thing these corporations respond to). The Plaintiff also expected the the Defendants to sell products that are absolutely safe and that would not expose him to addiction. The Defendants were selling advance technological machinery and had received special training and certifications that the Plaintiff had not. The Plaintiff was fraudulently induced to enter into a contract with the Defendants through their false advertising initiatives. The Plaintiff was never warned of the defects in the Defendants products. The Defendants did not tell him about the

addictive qualities of the pornography that they knew he would be subjected to, given their secretive relationship with predatory pornographic content providers, who they protect. The aggrieving party was in a superior and entrusted position. The Defendants engaged in grievous and perfidious misconduct in extreme bad faith in breaching the contract in unconscionable ways for their collective benefit. The Plaintiff suffered personal, financial, and emotional injuries as a result and the quality of his life greatly diminished.

COUNT FOURTEEN: FEDERAL VIOLATION OF SECTION 15 U.S.C. §§ 1051 ET SEQ: LANHAM ACTFOR FALSE ADVERTISING

Truthful lips endure forever, but a lying tongue is but for a moment. Proverbs 12:19

221. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

- 222. The Lanham Act establishes a federal cause of action for, among other things, false advertising:
- (a)(1) Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which
- (B) in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services, or commercial activities, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

The plain language of the statute permits any person likely to be damaged to assert a claim based on a false or misleading statement of fact about a product, service, or commercial activity.

- the defendant made a false or misleading statement of fact in a commercial advertisement about a product to the Plaintiff;
- (2) the statement deceived and had the capacity to deceive a substantial segment of potential consumers, which include the Plaintiff.
- (3) the deception was material, in that it was calculated to influence the consumer's purchasing decision; (4) the product was in inter state commerce; and (5) the plaintiff was been injured as a result of the statement.
- 223. For purposes of Rule 9(b), in the afternoon around 3pm, on separate days, in close proximity to one another, the Plaintiff was sold products created by Motarola, Blackberry, Samsung, Android by Verizon by individuals at the stores on West End Avenue, 2801 West End Avenue Nashville, TN 37203 and Greenhills 4044 Hillsboro PikeNashville, TN 37215. The Verizon agents held themselves as technological experts and authorized agents of the manufactures. They purposefully informed the Plaintiff that the products were safe for consumption that I would not be adversely impacted whatsoever in putting the products to use. These statements were knowingly false. Their false advertising initiatives, failures to disclose hidden hazards, and flagrant misdirections was the proximate cause of the Plaintiff's injury. Hagen v. U-Haul Co. of Tenn., 613 F. Supp. 2d 986, 996 (W.D. Tenn. 2009); See, e.g., Evans v. Pearson Enters., Inc., 434 F.3d 839, 852-53 (6th Cir. 2006).
- 224. Additionally, in recent times in close proximity to the purchasing of products sold by the other Defendants, the Plaintiff went to a store located on White Bridge Road that was authorized to sell xbox and Dell computers and purchased devices there. The authorized sales man held himself out as an agent of the Dell and xbox. The Plaintiff was sold these products under false

information and misleading information that the products were safe. Neither the retailer nor manufacture provided any warning that the products could lead to injury.

225. When the Plaintiff purchased the products, he asked the salesmen, as a part of standard operating procedure and prudence, if he could be be hurt by the product. They said "no." The Plaintiff queried whether the device was defect or could place him in danger whatsoever. The authorized agents of the Defendants at the retail store said "no." There were no signs or warnings of any kind that the Plaintiff would be mercilessly hunted by predator pornographers for the Defendants' benefit. There was no indication that the Plaintiff would have trouble avoiding images and videos that constituted unbearable and overwhelming temptation, as they took advantage of the fact that he is a male sexual being, who is stimulated by site and desires to be loved by a member of the opposite sex. This failure to disclose was a material breach by highly trained technicians, who held themselves out as pro-family value types and as subject matter experts on complex electronics that used cutting edge technology. This reliance lead to the Plaintiff's injury. If (1) the Plaintiff was warned, if (2) the Defendants were not holding themselves out as pro-family types, if (3) the Defendants products were not deliberately sold in a defective manner that left the Plaintiff exposed at the mercy of pornographic predators, if (5) the products were sold on safe mode, if (4) the Plaintiff had to taken the steps to seek access from the Defendants to see porn, if (7) the Plaintiff were protected from being tricked into seeing porn, if (6) the Defendants were not making so much money off the fact that their customers are being addicted to porn and dependent on their products, the Plaintiff could have avoided being injured and the quality of his life would have been drastically better. The Plaintiff had no idea that he would be relentless pursued by pornographic predators that the Defendants maliciously

commissioned for their own personal benefit. Only the Defendants knew that information and that is why they have engaged in such elaborate scams. The Defendants want their customers addicted to porn and sexually dysfunctional in every way. It is good for business despite the consequences for the customers and the families who they marketed their products to. The manufacture and retail defendants promised to enhance family relationships, not destroy them.

COUNT FIFTEEN: FALSE ADVERTISING (Tennessee Common Law)

- 226. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
- 227. The Defendant engaged in unfair, deceptive, untrue, and misleading advertising. The facts alleged in the complaint demonstrate this.
- 228. The Plaintiff suffered injury in fact and lost money and property.

JOINT AND SEVERALLY LIABLE:

229. The Defendants are jointly and severally liable for the acts and omissions alleged in this complaint. All device makers who were part of the porn compact are liable. Because the Defendants all agreed to disregard obscenity laws and distribute pornography, all of the Defendants are equally liable for the injuries that followed. Now that there is a porn pandemic and sexual holocaust that has infiltrating the world community, I demand that all of the Defendants contribute to Christian organizations to clean up the mess they have made as a result of their Anti-American sales practices and corruption.

COUNT SIXTEEN: FALSE ADVERTISING (Tennessee Common Law)

230. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

- 231. The Defendant engaged in unfair, deceptive, untrue, and misleading advertising.
- 232. The Plaintiff suffered injury in fact and lost money and property.

COUNT SEVENTEEN: NEGLIGENT MISREPRESENTATION

- 233. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein
- 234. The Defendants made false statements of past or existing fact regarding their product235. The statements were directed at the suing party.
- 236. The statements had acted to induce the suing party to contract. The falsities caused injury.

COUNT EIGHTEEN: DUE PROCESS VIOLATION

- 237. The Fourteenth Amendment to the United States Constitution precludes any State from "depriv[ing] any person of life, liberty, or property, without due process of law." U.S. Const. amend. XIV, § 1.
- 238. I have the right to be free from Addiction. The retail and manufacturing defendants are distributing content that violates the obscenity standard in the community in Nashville. TCA §§ 39-17-901-927, 47 U. S. C. §231(The President and Attorney General could be held accountable for failure to enforce 18 U.S.C. Chapter 110). The Governor and Attorney General were well aware that this was occurring. But they refused to bring the Defendants under obscenity law. Accordingly, my liberty was infringed upon by their willful failure to act. The reason for their failure to act associated with the political contributes made from the member of the porn compact to the Governor's campaign and political party.
- 239. Upon information and belief, the Governor and Attorney General did not enforce obscenity laws against the manufactures named here because the Governor received campaign

avoided.

contributions from the other Defendants and/or partners with the Defendants.

240. If the Governor and Attorney General enforced the law, my injury would have likely been

COUNT NINETEEN: First Amendment — Free Exercise - Violation in Kind

241. In the United States, freedom of religion is a constitutionally guaranteed right provided in the religion clauses of the First Amendment under both the United States and Tennessee Constitutions. The First Amendment prohibits the federal government from making a law "respecting an establishment of religion, or prohibiting the free exercise thereof". This provision was later expanded to state and local governments, through the Incorporation of the Fourteenth Amendment.

242. Governor and Attorney General are charged to execute state obscenity laws which have a "secular purpose" insofar pornography has adverse impact on the brain. Lemon v. Kurtzman, 403 U.S. 602 (1971). However, since pornographers are distributing obscene content in the community that inhibit religion and since the Governor and Attorney are aware of this but refuse to enforce the law against device makers, their failure to act violated the Plaintiff's First Amendment rights, as an affront to Christianity. The Governor and Attorney General's failure to enforce the law is an effort to swift the Nation into an self/adult centric reality, not a Christ/children-centric one.

243. In terms of the Free Exercise clause of the First Amendment to the United States

Constitution, it states: "Congress shall make no law . . . prohibiting the free exercise [of religion]" The Tennessee State Constitution says the same thing. In the instant case, the Federal Government and state passed these laws TCA §§ 39-17-901-927, 47 U. S. C. §231 which

were designed to protect Christians from having the practice of religion infringed upon by the intrusive infiltration and distribution of obscenity into their communities. These statutes were also created, for non religious considerations because pornography has an adverse impact on our hearts and minds. The manufacture and retail Defendants distributed obscenity contents into the Plaintiffs home and onto his person in violation of obscenity laws.

244. The Governor and Attorney General were aware of these other Defendants violations and knew that the distribution of obscene content interfered with the Plaintiff's freedom to worship. Governor and Attorney General were also aware that the obscene content that the Defendants distribute is not protect under the freedom of speech under Miller. Yet, despite this knowledge, the Defendants failure to execute the law as they were required to intentionally persecute Christians, as directed by the Obama Administration and the Federal Attorney General's office. Accordingly, Governor and Attorney General have engaged in discrimination against religion by not taking action.

245. The Free exercise clause protects the right of conscious, and since the distribution of obscenity infuses us with permission giving beliefs about sex that are unhealthy, the Governor and Attorney General are liable for failing to act. Reynolds v. United States 98 U.S. 145, 164 (1879). The free exercise clause protects the exercise of religion, since pornography depletes oxytocin, which is the same chemical neuron need to connect with a personal faith-based relationship with God, failing to block the malicious subjection of unwanted pornography constituted a violation of the free exercise clause, interfering with the Plaintiff's freedom of worship.

As much as I would like to harangue these cowardly defendants through acrimonious onslaught

of pugilistic tactics, the paramount relief I seek is an preliminary and permanent injunction. I am more interest in solutions to protect the public and remedy the failure than I am in personal condemnation. I want to see the people who work at these companies thrive, but I want them to honor the laws of the United States and stop hurting us all through the illegal distribution of obscene content.

246. WHEREFORE,

- 1. Plaintiff demands a preliminary and permanent injunction be imposed on the manufacture and retail Defendants, going forward that requires the installation of software that makes reasonable attempts to blocks obscene pornography from coming onto the machines. The Plaintiff demands that the injunction cause the retail and manufacturing Defendants to comply with child obscenity laws in modifying the products so that they are safe for use. The Plaintiff demands that the filtering software not be removed, by manufacturer and retailer unless the purchaser can prove that he is over 18 years of age and the purchaser takes the initiative to request that the filters be removed at a face to face meeting. Otherwise, the filters should remain in place permanently; (parallel to the Prime Minister's demand, the Plaintiff demands that the filters make reasonable attempts to block pornography);
- 2. The Plaintiff demands that the Court order the Defendants to set up a system of face to face accountability where the purchaser who wants to deactivate the filter must provide proof that they are over 18 in person;
- 3. The Plaintiff demands that the Defendants be required to keep a list of every person who wants to have the filter deactivated and that the list be made available to the public at all times; (to include accessible by wives, the police, girl friends, employers, and parents).

- 4. The Plaintiff demands an award of pre-and post-judgment interest;
- 5. The Plaintiff demands that from six months of entry of the preliminary injunction that all products be affixed with filtering software or recalled from the shelves;
- 6. The Plaintiff demands a preliminary and permanent injunction that forces the Defendants to send out a filtering system updates as part of their next operating system with continuous software to keep them compliant with the laws on devices that they have already sold but remain within their control; If the purchasers of these already sold products want their filter removed, require that they go to designated retail stores and provide proof of ID and have their named added to the public list in order to do so; the Defendants sold these devices under false pretense that they were "porn free," and they should be ordered to deliver on that promise, since they have defrauded the public through false advertising;
- 7. The Plaintiff demands a preliminary and permanent injunction that requires to the Defendants to provide any customer who seeks to have the filter removed, who is over the age of 18, with a literature on the addicting qualities of the pornography that they are distributing; the Plaintiff demands that the Defendants be required to provide a warning on with every computer of the consequences of interacting with porn on their site like as the British Prime Minister suggested; 8. The Plaintiff demands a preliminary and permanent injunction that requires the Defendants to form a joint task force with law enforcement to offset the dangerous conditions they have exposed them to by selling their products in a dangerous condition; the Plaintiff demands that a permanent and preliminary injunction be imposed on the Defendants to work with law enforcement to block websites that are likely engaging in organized crime, like Backpage.com; 9. The Plaintiff demands that he be awarded an amount over \$75,010 minimal jurisdictional limit

to cover loss of income, medical expenses, costs, disbursements, reasonable attorneys fees, interest, for his personal damages, and whatever other relief the Court deems just and equitable; 10. The Plaintiff request compensatory damages under every count, treble damages, punitive damages, equitable damages;

- 11. The Plaintiff demands a declaration that the Governor and Attorney General violated his freedom to worship and freedom of religion under the Constitution for refusing to enforce obscenity laws against device makers; the Plaintiff demands that an injunction that requires the Governor and Attorney General to enforce obscenity laws against retail and manufacturers, like the ones here, to comply with obscenity laws, which will make products safe;
- 12. The Plaintiff demands an injunction against Planned Parenthood, who is a partner of in the porn compact, ordering the organization out of the public school system for not merely spreading a false gospel that amounts to a set of religious ideals, but for disregarding the science of dopamine and classical conditioning in a manner that is eroding freedom;
- 13. The Plaintiff demands an award of the maximum punitive damages to be paid out to the following organizations to help combat pornography addiction and sex trafficking that the Defendants have inflicted upon our state, Nation, and world, who are working to combat the public health crisis that the Defendants arrogance and greed has caused; the Plaintiff demands an award of over 100 million dollars to be paid out over time to the following organizations who are proactively fighting to clean up the unlawful actions of the Defendants; the testimony at trial by expert witnesses and reports should mandate the award amount; the Plaintiff demands that the award go to:
- 1. Fight The New Drug;

- 2. Pink Cross Foundation
- 3. Girls Against Porn
- 4. LA Dream Center (Los Angeles)
- 5. Tim Keller Redeemer Church New York City
- 6. A21 Campaign, a 501(c)(3) non-profit, non-governmental organization that works to fight

human trafficking

- 7. Porn Harms;
- 8. International Justice Mission
- 9. Cross Point Church and West End Community Church (Nashville TN).
- 10. Church Of The Highlands; (Birmingham Dream Center)
- 11. Willow Creek (Chicago)
- 12. McClean Bible Church (DC)
- 13. Free Chapel Church (GA)
- 14. Hand of Hope Ministries Joyce Meyer
- 15. New LIfe Church (Arkansas)
- 16. Healing Place (Louisiana)
- 17. Hillsong Church (Paris)
- 18. Hillsong Church (Australia)
- 19. Time Square Church (New York City)
- 20. North Point Church (GA)
- 21. South Eastern Christian (KY)
- 22. White Ferry Road Church (West Monroe LA) 20. Oasis Church (Los Angeles)

- 23. Life Church (Memphis)
- 24. The Well House (Birmingham Alabama)
- 25. Morality In Media (DC)
- 26. Substance Church (Minesota)
- 27. C3 (North Carolina)
- 28. Adventures in Missions; The World Race Athens Georgia
- 29. West End Community Church Missionary Team
- 30. Saddle Back Church (CA)
- 31. Calvary of Albuquerque (New Mexico)
- 32. Christian Fellowship (Palm Beach FL)
- 33. The Rock Church (San Diego)
- 34. Crossroads (Cincinnati OH)
- 35. Gate Way Church (Dallas TX)
- 36. Heritage Christian Center (Denver)
- 37. Bethel Baptist (Jacksonville FL)
- 38. Celebration Church (Austin)
- 39. Celebration Church (Jacksonville FL)
- 40. First Baptist Church (Orlando)
- 41. Maranatha Chapter
- 42. Abolition International
- 43. Agape International Missions, a nonprofit organization in Cambodia 44.

ChildhopeAsiaPhilippines,

- 45. Coalition to Abolish Slavery and Trafficking, a Los Angeles
- 46. Freedom Matters
- 47. ABC Nepal, a non-profit non- governmental organisation working in Nepal on trafficking of girls and minors across India and Arabian countries, founded by Durga Ghimire.
- 48. AFESIP (Agir pour les Femmes en Situation Precaire or Acting for Women in Distressing Situations), a Cambodian NGO dedicated to rescuing, housing and rehabilitating women and children in Cambodia, Laos, and Vietnam who have been sexually exploited.
- 49. AFESIP conducts outreach work to try helping the women still enslaved. The organization also works with law enforcement to raid the brothels.
- 50. Alliance Anti Trafic, a non-profit organization working in Southeast Asia on the causes and consequences of trafficking in persons and sexual exploitation.
- 51. Apne Aap Women Worldwide, a grassroots movement to end sex trafficking based in New Delhi, founded by Ruchira GuptaApne Aap Women's Collective (AAWC), helping the women and children of the Kamathipura red light district in Mumbai, and unaffiliated with the Apne Aap Women Worldwide organization.
- 52. 8th Day Center for Justice, a Roman Catholic non-profit organization based in Chicago, Illinois A Better World, an organization that is based in Lacombe, Alberta, Canada.
- 53. ACT Alberta, a Canadian coalition of Government of Alberta representatives, non-governmental organizations, community organisations, and the Royal Canadian Mounted Police54. Agape International Missions, a nonprofit organization in Cambodia.
- 55. Araminta Freedom Initiative, a Baltimore based non-profit whose vision is to see the commercial viability of the human trafficking of minors in the Baltimore region dismantled and

its victims freed.

- 56. Arizona League to End Regional Trafficking, a coalition representing partnerships with law enforcement, faith-based communities, non-profit organizations, social service agencies, attorneys and concerned citizens.
- 57. Breaking Free, a nonprofit organization based in Saint Paul, Minnesota, United States that provides various services to prostitutes, such as help finding a place to live and a job outside the sex industry
- 58. "Breaking Out Corporation", a 501 (c) (3), a pro-active, not-for-profit organization whose mission is dedicated to Identify, Investigate and Rescue Victims of Human Trafficking, domestically and internationally. Breaking Out Corporation works in concert with law enforcement to affect Human Trafficking at its source. Breaking Out was specifically formed to fill desperate need in the fight against Human Trafficking to bridge the gap between awareness and action.
- 59. California Against Slavery, a human rights organization directed at strengthening California state laws to protect victims of sex traffickingCalled to Rescue, a non-profit worldwideorganization based in Vancouver, Washington given to rescuing minor children from sex trafficking, violence and abuse.
- 60. Centre to End All Sexual Exploitation, a nonprofit organization that helps human trafficking victims, sex workers, and the homeless by providing them with resources.
- 61. Chab Dai, a coalition founded by Helen Sworn that connects Christian organizations committed to ending sexual abuse and trafficking.
- 62. Childhope Asia Philippines, an international, non-profit, non-political, non-sectarian

organization whose principal purpose is to advocate for the cause of street children throughout the worldChildren of the Night, the first and most comprehensive sex trafficking program in North America, including a 24 bed shelter home for 11-17 year olds.

- 63. Children for Change Cambodia is a local, Cambodian-led NGO working to prevent the sexual exploitation of children in the Sensok community by providing educational scholarships.

 CCC's Center is a hub of activity in the middle of Phnom Penh's poorest red-light district. At CCC, children have access to a small library, daily classes, and often the only meal they may eat that day.
- 64. Children's Organization of South East Asia, the Children's Organization of Southeast Asia, COSA is an International Organization which works towards the prevention of child human trafficking and sexual exploitation within the Northern regions of Thailand.
- 65. Children's Rescue Initiative, an international organization which actively rescues children and slaves from human trafficking and child labor.
- 66. Coalition Against Trafficking in Women, an international non-governmental organization opposing human trafficking, prostitution, and other forms of commercial sexCoalition to Abolish Slavery and Trafficking, a Los Angeles-based anti-human trafficking organizationCrowns of Hope provides financial assistance and Christian therapy for female victims of human trafficking and sexual abuse in Central Texas.
- 67. Deborah's Gate, a human trafficking victims safe house run by The Salvation Army in Vancouver, British Columbia, Canada that opened in 2009.
- 68. Destiny Rescue, is a grassroots, internationally recognized, Christian based, non-profit organization dedicated to rescuing children from human trafficking and sexual exploitation. We

help rescue the sexually exploited and enslaved, restore the abused, protect the vulnerable, empower the poor and are a voice for those that can't speak up for themselves. Currently we are operating in Thailand, Cambodia, Laos, Myanmar (Burma), India and Mozambique.

69. ECPAT, an international non-governmental organization and network headquartered in Thailand which is designed to end the commercial sexual exploitation of children

70. Emancip ACTION (www.emancipaction.org), a Mumbai-based international, non-profit organization dedicated to putting an end to the commercial sexual exploitation of children around the worldThe Emancipation Network, an international organization dedicated to fighting human trafficking and modern-day slaveryEVE, an advocacy group based in Vancouver, British Columbia, Canada.

- 71. Face to Face Bulgaria, an organization whose primary mission is to prevent cases of forced prostitution and human trafficking in Bulgaria.
- 72. Florida Abolitionist, a nonprofit, non-governmental organization opposing human trafficking in Florida, United StatesFreedom Matters, a UK charity fighting trafficking and modern day slavery principally in Nepal but operating in India and beyond. This list is incomplete; you can help by expanding it.
- 73. Free for Life International,a U.S.-based non-profit human rights organization that globally works to partner with organizations and individuals globally to rescue victims and meet the needs of trafficking survivors and those who are considered to be in high risk of being trafficked. They partner by providing financial, emotional and spiritual support(http://freeforlifeintl.org/, https://www.facebook.com/Freeforlifeintl)GABRIELA, a leftist Filipino organization that advocates for women's issues

- 74. Global Alliance Against Traffic in Women, a network of more than 100 non-governmental organizations from all regions of the world, who share a deep concern for the women, children and men whose human rights have been violated by the criminal practice of trafficking in persons Global Impact Phils Foundation, a Philippines-based organization that works to prevent human-trafficking (http://www.myglobal.org/, https://www.facebook.com/myglobal? directed target id=0)
- 75. Go MAD Ministries is a Christian not-for-profit based out of Texas established to fight human exploitation in the Dominican Republic. (Go MAD Ministries on Facebook)

 76. Happy Horizons Children's Ranch is a humanitarian ministry of the Assemblies of God, Philippines. It is a non-profit organization dedicated to the rehabilitation and defense of street children in the Philippines http://www.hhcr.orgIng

77. International Justice Mission, a U.S.-based non-profit human rights organization that

- operates in countries all over the world to rescue victims of individual human rights abuse.

 78. International Princess Project: advocating for women enslaved in prostitution; restoring their broken lives; empowering them to live free. The vision of International Princess Project is for International women once enslaved in the sex trade to have the opportunity to support themselves with skill and dignity, to heal in body, and spirit, and to live lives of freedom and forpeople worldwide to gain awareness about human trafficking and to rise up with finance and action to end forced prostitution. www.intlprincess.org
- 79. TEMP Institute for Trafficked, Exploited & Missing Persons, an international organization dedicated to ending contemporary slavery and human trafficking through public awareness, research and direct intervention.

- 80. Kabataang Gabay sa Positibong Pamumuhay (KGPP), Inc. an association of survivors and victims of male trafficking for the purpose of prostitution, pornography, the trade of illicit drugs, organized crime and exploitative forms of labor in the Philippines. Known for its ROLLI Fellowship, a survivor engagement program anchored on the core principles of human dignity, human rights and human capacity in empowering, enabling and engaging survivors in combating human trafficking and addressing the sequel of health and social ills arising from it among those who are afflicted.
- 81. La Strada International Association, an international NGO network addressing trafficking in human beings in EuropeLondon Anti-Human Trafficking Committee, a London, Ontario, Canada-based nonprofit organisation opposing human trafficking by means of advocacy and education.
- 82. Love 146 Vision- The abolition of child trafficking and slavery, nothing less. http://love146.org/Maiti Nepal, a non-profit organization in Nepal dedicated to helping victims of sextrafficking.
- 83. MANNA Freedom, the human trafficking intervention arm of MANNA Worldwide working to prevent human trafficking in Eastern Europe through the building of Bridge To Life Homes.
- 84. Men Against Sexual Trafficking, a London, Ontario, Canada-based organisation that opposes human trafficking by educating men on the issue and encouraging them to stop buying sexual services provided by human trafficking victims.
- 85. Million Kids (Riverside, California) serves as the Training and Outreach Coordinator for the Riverside County Sheriff Anti-Human Trafficking Task Force. http://www.millionkids.orgMongolian Gender Equality Center, a non-governmental organization based

in Ulaanbaatar, Mongolia.

- 86. MTV EXIT (www.mtvexit.org) is the world's largest behaviour change campaign in the fight against human trafficking and exploitation.
- 87. NASHI, a Saskatoon, Saskatchewan, Canada-based organisation that opposes human trafficking by raising awareness through education.
- 88. Not for Sale Campaign, a 501(c)(3) non-profit organization based out of CaliforniaOffice to Combat Trafficking in Persons, a government agency responsible for coordinating efforts to address human trafficking in British Columbia, Canada.
- 89. Pillars of Hope, Inc. a faith based non profit that opposes human trafficking; is raising awareness and funds to build a restoration center in California; working to raise awareness of the tragedy occurring in the United States. url=http://www.pillarsofhope.usPolaris Project, a nonprofit, non-governmental organization that works to combat and prevent modern day slavery and human trafficking.
- 90. PREDA Foundation, a charitable organization that was founded in Olongapo City, Philippines in 1974.
- 91. Project Rescue, a nonprofit Assembly of God organization that exists to rescue and restore victims of sexual slavery. It was founded in the red light district of Mumbai, India in 1997. It has 12 locations throughout India, Nepal, Moldova, Bangladesh, Tajikistan and Spain. url=http://www.projectrescue.comRahab Ministries Thailand, a Christian non-governmental organization that provides outreach for sexually trafficked women and children in Thailand.
- 92. Rapha House, a public benefit 501(c)(3) nonprofit committed to ending human trafficking, bonded labor and the sexual exploitation of children. url=http://www.raphahouse.org/Ratanak

International, an organization that rescues children from sexual slavery and then provides them with education, rehabilitation, and safety.

- 93. Reaching Out Romania, a non-governmental[35] charitable organization in Romania that helps girls ages 13 to 22 exit the sex industry.
- 94. Real Escape from the Sex Trade (REST) is a 501c3 faith-based nonprofit organization in Seattle, WA working to provide a path to freedom, safety and hope for victims of sex trafficking and people involved in the sex trade through direct services, prevention, mentorship, restorative housing, case management, educational assistance and demand reduction efforts. Redeem The Shadows (RTS) is a 501(c)3 faith based non-profit organization that combats human trafficking through awareness, prevention and rehabilitation (www.redeemtheshadows.com).
- 95. Redlight Children Campaign, a non-profit organization created by New York lawyer and president of Priority Films Guy Jacobson and Israeli actress Adi Ezroni in 2002 to combat worldwide child sexual exploitation and human trafficking.
- 96. Redlight Traffic, a 501(c)(3) non-profit that uses technology to unite organizations, communities, and individuals and say "NO" to human traffickingRicky Martin Foundation, an organization with the mission to advocate for the well-being of children around the worldRide for Refuge, a cycling event that raises awareness and funds for displaced persons, including human trafficking victims.
- 97. Run 2 Rescue, a 501(c)(3) non-profit organization based in California that reaches, rescues and restores victims of sex trafficking. www.run2rescue.comSalvando Corazones is a 501(c)(3) non-profit organization that runs safe houses and is dedicated to the fight against human trafficking in Costa Rica.

98. Seeds of Hope Homes, INC, a 501 (c) 3 non-profit organization under Hands Up High Ministries which exists to educate, rehabilitate and eradicate sex trafficking.

www.seedsofhopehome.com.

- 99. Shared Hope International, a 501 (c) 3 non-profit organization which exists to rescue and restore women and children in crisis.
- 100. Silent Integrity (http://silentintegrity.org.au) is a not for profit organization (Incorporation No.A0057776M).
- 101. Slavery Footprint, a nonprofit organization based in Oakland, California that works to end human trafficking and modern-day slavery.
- 102. Slavery Report, a nonprofit organization based in Northern Virginia that works to maximize human trafficking reporting.
- 103. Somaly Mam Foundation, a registered 501(c)(3) nonprofit organization focused on combating the global sex slave trade through supporting the rescue, rehabilitation, and reintegration of the victims and through raising global awareness on the issue.
- 104. StAT NC (Stand Against Trafficking), a registered 501(c)(3) non profit organization dedicated to the healing and restoration of women who have been rescued from human trafficking. (http://www.standagainsttraffickingnc.org)STIGMA, a Cyprus non-profit organisation for Anti-Trafficking and Protection of Victims of Sexual Abuse & Exploitation 105. Stop Child Trafficking Now, an organization founded by Lynette Lewis, an author and public speaker,
- 106. Stop the Traffik, a campaign coalition which aims to bring an end to human trafficking worldwide.

- 107. The Defender Foundation, a 501(c)3 Non-Governmental Agency formed to fight human trafficking through active activism of volunteers and tactical rescue teams (Shield Teams) who physically rescue victims both in the U.S. and worldwide.
- 108. The Protection Project, a 501(c)3 Non-Governmental organization based at the Johns Hopkins University, School of Advanced International Studies in Washington DC which advises governments on drafting and implementing anti-trafficking legislation and promotes the inclusion of trafficking in the curriculum of universities around the worldThird World Movement Against the Exploitation of Women, an organization directed towards the liberation of women from all kinds of oppression and exploitation based on sex, race or class.
- 109. Tiny Hands International, a Christian nonprofit organization dedicated to helping orphaned and abandoned children and fighting sex trafficking in South Asia
- 110. Traffic J.A.M., International is a 501(c)3 dedicated to preventing commercial sexual exploitation in countries of origin through grass roots networks. Awareness cells are working in Universities, bus stations, plazas, elementary & secondary schools, markets, among taxi drivers & hotel staff ... Websites in English: ijamtraffic.com and in Spanish ijamtraffic.net.
- 111. Truckers Against Trafficking, a nonprofit organization that trains truck drivers to recognize and report instances of human trafficking.
- 112. Unlikely Heroes, an international, non-profit organization based in Los Angeles, CA that rescues and restores child victims of sex slavery worldwide, founded by Erica Greve.
- 113. Visayan Forum Foundation, a non-profit, non-stock and tax-exempt non-government organization in the Philippines established in 1991Vital Voices, an international, non-profit, non-governmental organization that works with women leaders in the areas of economic

empowerment, women's political participation, and human rights.

- 114. Wipe Every Tear (www.WipeEveryTear.org) rescues precious girls and women trafficked in the sex trade in South East Asia.
- 115. WalkFree (www.walkfree.org) is an international movement to end modern slavery worldwide.
- 116. Walk With Me Canada Victim Services, Canada based, providing victim services for survivors of human trafficking.
- 117. Women's Support Network of York Region, a nonprofit organization that serves the Regional Municipality of York in Ontario, Canada, operating with an anti-oppressive, anti-racist, feminist philosophy.
- 118. World Orphans, an organization that funds the creation of orphanages in developing countries.

Respectfully Submitted,

- 119. Sea Coast (SC)
- 120. Joyce Meyer's Mercy Ministries
- 122. Bethel Church (CA)
- 123. Oasis Center (CA)
- 124. Reform University Ministries
- 125. Campus Crusade for Christ